UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 2 8 2019

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7017 0530 0000 1268 1025
RETURN RECEIPT REQUESTED

Mr. Robert E. Edwards, III
Manager
Portsmouth/Paducah Project Office
U.S. Department of Energy
1017 Majestic Drive, Suite 200
Lexington, Kentucky 40513

Mr. Bobby Smith
Fluor-B&W Portsmouth, LLC
Post Office Box 548
Piketon, Ohio 45661

Re: Notice of Violation
RCRA Compliance Inspection
U.S. DOE Portsmouth Gaseous Diffusion Plant, Piketon, Ohio
OH7 890 008 983

Dear Messrs. Edwards and Smith:

On April 17th and 18th, 2018 a representative of the U.S. Environmental Protection Agency inspected the U.S. Department of Energy Portsmouth Gaseous Diffusion Plant facility located near Piketon, Ohio (U.S. DOE Portsmouth). The purpose of the inspection was to evaluate U.S. DOE's and Fluor-BWXT Portsmouth (Fluor-BWXT) compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, storage of hazardous waste and the RCRA Hazardous Waste Installation and Operation Permit issued by Ohio EPA to the U.S. DOE and Fluor-BWXT for the Portsmouth facility. We have enclosed a copy of the RCRA inspection report for your reference.

Based on information provided by U.S. DOE and Fluor-BWXT personnel, review of records and physical observations by the inspectors, EPA finds that the U.S. DOE Portsmouth facility was not in compliance with a certain requirement of the Ohio Administrative Code (OAC), the United States Code of Federal Regulations (C.F.R.).

EPA has determined that U.S. DOE Portsmouth violated a RCRA requirement related to satellite accumulation area (SAA) containers, as described in paragraph 1, below.

1. Satellite Accumulation Area Requirement

Under Ohio Admin. Code § 3745-52-34(C)(1) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in rule 3745-51-31 or paragraph (E) of rule 3745-51-33 of the Administrative Code in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with paragraph (A) or (D) of this rule provided he: (a) Complies with rules 3745-66-71, 3745-66-72, and paragraph (A) of rule 3745-66-73 of the Administrative Code; and (b) Marks the containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

At the time of the inspection of room 103 near the loading dock in Building X-710, the inspector observed three 5-gallon SAA containers within the less than 90-day accumulation area. Fluor-BWXT personnel told the inspector that the "unused samples" had come from room 203 because of limited accumulation space. The three 5-gallon containers were not under the control of the operator where the wastes originally accumulated. Please make sure that SAA containers remain under control of the operator of the process generating the waste.

Area of Concern

Treatment (such as crushing) by a Universal Waste Handler (UWH) is prohibited under this rule unless the facility is permitted for such activities as provided in Ohio Admin. Code § 3745-273-33. See, Ohio Admin. Code § 3745-273-31(B). A generator crushing lamps must manage lamps according to hazardous waste rules (Ohio Admin. Code Chapter 3745-52). Lamp crushing is a form of generator treatment, Ohio Admin. Code § 3745-52-34. Any crushed lamps must be sent off-site with a hazardous waste manifest.

At the time of the inspection of Building X-744L, the inspector observed a "Bulb Eater" bulb crushing device that was to be installed. Please provide an update on the status of the bulb crushing device.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above SAA requirements.

If you have any questions, please feel free to contact me at 312-886-8121, or your staff may contact Mr. Walt Francis, of my staff, at 312-353-4921 or at francis.walt@epa.gov.

Sincerely,

D. Scott Ireland
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Dr. Vincent Adams, Portsmouth Site Director (vince.adams@lex.doe.gov)
Amy Tegethoff, Ohio EPA (amy.tegethoff@epa.ohio.gov)
Mitch Matthews, Ohio EPA (mitchel.matthews@epa.ohio.gov)

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**U.S. DOE PORTSMOUTH GASEOUS DIFFUSION PLANT**
FACILITY U.S. EPA ID NO.:	**OH7 890 008 983**
FACILITY TYPE:	**Large Quantity Generator and Container Storage Facility**
FACILITY ADDRESS:	3930 US Route 23 South Piketon, Ohio 45661
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE(S) OF INSPECTION:	April 17th and April 18th, 2018
SIC CODE:	2819 - Industrial Inorganic Chemicals, Not Elsewhere Classified
NAICS CODE:	325188 - All Other Basic Inorganic Chemical Manufacturing

PREPARED BY: _____ 5/21/2018
Walt Francis **Date**
Environmental Scientist

APPROVED BY: _____ 5/22/18
Julie Morris, Chief **Date**
Compliance Section 2
RCRA Branch

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the U.S. Department of Energy (U.S. DOE) Portsmouth Gaseous Diffusion Plant (Portsmouth), Piketon, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Ohio Administrative Code (OAC), and the RCRA Permit requirements with respect to U.S. DOE's and Fluor-BWXT Portsmouth, LLC's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Representatives of U.S. DOE, Fluor-BWXT Portsmouth, LLC (Fluor-BWXT), Portsmouth Mission Alliance (PMA), and Restoration Services, Inc. (RSI) -
Amy Lawson, U.S. DOE
Kristi Wiehle, U.S. DOE
Jeremy Davis, U.S. DOE
Rosemary Richmond, RSI
Ryan Callihan, RSI
Barbara Halcomb, Fluor-BWXT
Chris Guilliams, Fluor-BWXT
Lindsay Moore, Fluor-BWXT
Michael Daniels, Fluor-BWXT
Jeff Riley, Fluor-BWXT
Marilew Bartling, Fluor-BWXT
Frank Johnston, Fluor-BWXT
Nate Banks, PMA

Site Description/Background Information

Historically, the main function of the Portsmouth facility was to enrich uranium for military use (nuclear submarines and nuclear weapons) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in uranium hexafluoride (UF6) feedstock which contains 0.711% U235. The Portsmouth facility was constructed from 1952 to 1956 and had produced enriched uranium continuously since September 1954. In 1993, the uranium enrichment facilities at the plant were leased to the United States Enrichment Corporation (USEC). U.S. DOE retained ownership of the ongoing site environmental restoration program as well as the permitted hazardous waste storage facilities.

Numerous other activities associated with the plant's main function also occur on-site and were leased by USEC. As of March 2012, U.S. DOE and Fluor-BWXT activities included decontamination of equipment and uranium recovery (X-705 Building); chemical cleaning of

equipment (X-700); maintenance crafts, including paint, sheet metal, machining, valve, compressor, welding, electrical, motor rewind, metallurgy, instruments and carpentry (X-720); laboratory services (X-710); wastewater treatment (X-6619); water treatment (X-611); chromium removal (X-616); uranium operations, fluorine generation and cylinder handling (X-344); vehicle repair (X-750); coal pile runoff treatment (X-621); and electrical and utilities system.

Hazardous waste and mixed waste which was generated from the gaseous diffusion and associated processes leased by USEC is stored in U.S. DOE owned and permitted storage facilities. Waste generated by U.S. DOE and Fluor-BWXT from the environmental restoration is also stored in these facilities. U.S. DOE also generates non mixed radioactive hazardous waste, which is shipped out of Building XT-847. Universal waste is accumulated and shipped out of Building X-744L, and used oil is accumulated in Building X-741. USEC ceased the enrichment process in May 2001, and discontinued on-site operations on October 10, 2011. U.S. DOE and Fluor-BWXT manage hazardous waste, universal waste and used oil generated from on-site maintenance, on-site storage activities, remediation, and demolition activities.

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and are generated by U.S. DOE and Fluor-BWXT are stored on-site in U.S. DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of treatment, storage and disposal (TSD) facilities in the United States which could accept mixed waste, and a May 1991 U.S. DOE moratorium on off-site waste shipment. A large percentage of the waste generated at Portsmouth is U.S. DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in U.S. DOE-owned storage areas.

U.S. DOE/Fluor-BWXT generated hazardous wastes are primarily shipped to: Energy Solutions Clive Facility, Grantsville, Utah (UTD982598898); DSSI/Permafix, Kingston, Tennessee (TND982109142); Permafix Environmental/M&EC, Oak Ridge, Tennessee (TNR000005397); Michigan Waste Disposal, Belleville, Michigan (MID000724831); U.S. DOE NST, Mercury, Nevada (NV3890090001); Permafix Florida, Gainesville, Florida (FLD980711071); Environmental Protection Services, Wheeling, West Virginia (WVD988770673); and in addition, a wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

On October 20, 2017, Ohio EPA approved a Class 1A Permit Modification removing area X-326 from the permit and revising the storage capacity in Buildings X-330, X-345, and X-705. The renewed RCRA Permit states in Section B.36(m) that U.S. DOE/Fluor-BWXT may store restricted waste beyond one year; however, the Permittee bears the burden of proving that such storage was solely for the purpose of accumulating such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal [OAC Rule 3745-270-50].

On September 17, 2015, Fluor-BWXT sent an application to Ohio EPA to modify the RCRA Permit to include RCRA waste handling capabilities in Buildings X-330, X-345 and X-705 and the phase out of the current RCRA waste storage area in Building X-326. The changes also

included the addition of Closure Plans for the X-330, X-345 and X-705 proposed RCRA storage areas, as well as modifications to the Waste Analysis Plan, Procedures to Prevent Hazards, Contingency Plan and Personnel Training sections of the RCRA Permit. On October 15, 2015, the facility held a public meeting, and the public comment period for the proposed modification ended on November 19, 2015. On October 23, 2015, Ohio EPA sent a Hazardous Waste Permit Class 2 Modification Notice of Deficiency to U.S. DOE and Fluor-BWXT. On January 15, 2016, Ohio EPA approved the Permit Modification.

On December 17, 2015, U.S. DOE submitted an Annual Report to Ohio EPA for Fiscal Year 2015 for the April 13, 2010 Ohio EPA Director's Final Findings and Orders for Removal Action and Remedial Investigation and Feasibility Study and Remedial Design and Remedial Action. Currently, Records of Decision for the Site-wide Waste Disposition and Decontamination and Decommissioning of Process Buildings and Complex facilities were finalized in 2015. Decontamination and decommissioning (D&D) work has started in the X-326 building. Soil remediation at the X-114A firing range occurred in 2015 and D&D work on the structures should occur this year. The on-site landfill construction is underway and landfilling should begin in 2020.

Opening Conference

On April 17, 2017, Walt Francis arrived at Building X-1000 at approximately 7:45 a.m. and informed the U.S. DOE, RSI, and Fluor-BWXT representatives of the nature, scope, and procedures for the inspection. The inspection was conducted by U.S. EPA personnel as a Federal lead inspection. Ohio EPA personnel were unable to participate in the inspection. The facility representatives provided the inspector with a brief update of the facility, and a list of current hazardous waste satellite accumulation area (SAA) containers, hazardous waste less than 90-day accumulation areas, used oil and universal waste accumulation areas. The current site activities include: D&D; the DUF6 Conversion Plant; and the Centrus Energy facility research and demonstration project. The Portsmouth site currently has approximately 1,749 employees (U.S. DOE-21, Fluor-BWXT-1518, PMA-159, and RSI-51). Ms. Wiehle did not make a confidential business information claim on the information gathered during the inspection. Ms. Wiehle allowed the inspector access to the facility to conduct the inspection.

Site Tour

The RCRA inspection team included Ms. Lindsay Moore, Mr. Ryan Callihan, Mr. Michael Daniels, Mr. Jeff Riley, Mr. Chris Guilliams, and Mr. Walt Francis. The inspection began at Building X-622. Mr. Jeremy Galloway and Mr. Greg Thompson, Ground Water Treatment Facility Operations, showed the inspector a 55-gallon SAA container labeled "F001, Bag Filters, PPE, and Plastic" and a less than 90-day hazardous waste accumulation container labeled "Pumps, F001, 3/16/2018". Mr. Galloway told Inspector Francis that used groundwater treatment pumps were in the 55-gallon container. The walk-through continued to Building X-624. Mr. Galloway showed the inspector a SAA container labeled "Bag Filters, PPE, Carbon,

F001". The walkthrough continued to Building X-752. Mr. Kevin Cawley showed Inspector Francis a SAA container labeled "MT Aerosol Cans, X-752" and two 30-gallon containers of used oil. The walkthrough continued to Building XT-847. Ms. Mable Tanner showed Inspector Francis an empty less than 90-day accumulation area at column C-2. Inspector Francis reviewed the weekly inspection log. The walkthrough continued to column D-17. Ms. Moore told Inspector Francis that this area was utilized for accumulation of universal waste. Inspector Francis noted that this area was empty. The walkthrough continued to area D-19. Inspector Francis observed four 55-gallon containers and a 30-gallon container labeled "Used Oil", and a 55-gallon container labeled "Used Oil Grease". The walkthrough continued to column C-7. Inspector Francis observed a SAA area for electronic scrap. The walkthrough continued to column C-2. Inspector Francis observed two 5-gallon containers labeled "Light Bulbs", "Mercury Switches", and "Aerosol Cans". The walkthrough continued to Area N-2. Inspector Francis noted that the area was empty. The walkthrough continued to Building X-1007. Ms. Moore showed Inspector Francis two containers labeled "Universal Waste, 4/16/2018", a container labeled "Broken Light Bulbs, D008/D009, 4/10/2018", four boxes labeled "Used Lamps", one box of 4-foot and one box of 8-foot used lamps dated "4/16/2018, two 5-gallon containers of broken lamps dated "7/19/2017", and one 5-gallon container labeled "Broken Bulbs, 2/5/2018". The walkthrough continued to Building X-330. Inspector Francis observed a container labeled "F001, Soil Sampling Waste, 2/26/2018", a container labeled "18-001261, Not Hazardous Waste", and a container labeled "F001, 1/26/2018" in Area 1. Inspector Francis observed eleven 55-gallon containers in this area, four 5-galllon containers and thirteen polybottles. Inspector Francis observed a label on a polybottle "D002, HNO_3/H_20 6/25/2015, #15-004910". The walkthrough continued to a yellow cabinet in Area 1. Inspector Francis observed several containers of hazardous waste in the cabinet. The walkthrough continued to a CERCLA Accumulation Area at Column K-81. Inspector Francis observed a blue metal container that was dated "3/5/2018". The walkthrough continued to another CERCLA Staging Area at Column W35. Inspector Francis observed four 55-gallon containers labeled "Used Oil CERCLA", a 30-gallon container labeled "Aerosols, D001, 10/25/2017, #18-000903", a container labeled "DOE Aerosols, 1/26/2017, #17-002280", and two universal waste containers dated "10/4/2017" and "12/14/2016". The walkthrough continued to Building X-344A. Inspector Francis observed two 55-gallon containers labeled "Universal Waste" dated "4/9/2018 and 3/3/2018", a container of four-foot used fluorescent lamps dated "4/4/2018", and a 55-gallon container of used oil. The walkthrough continued to Building X-530. Ms. Moore showed Inspector Francis a container of universal waste in the control room dated "7/20/2017". The walkthrough continued to Battery Room Number 2. Ms. Moore showed Inspector Francis a 5-gallon SAA container labeled "Battery Acid". The walkthrough continued to a universal waste accumulation area. Inspector Francis observed two universal waste containers labeled "Universal Waste 10/30/2017", and "Universal Waste Incandescent Bulbs" dated "10/24/2017", and six used lead acid batteries. The walkthrough continued to Building X-720C. Ms. Moore introduced Mr. Steve Haffner. Mr. Haffner showed Inspector Francis two totes labeled "Used Oil" and a hazardous waste less than 90-day accumulation area. Inspector Francis observed a container labeled "Tear Gas X-114A, D001, 3/26/2018, 16-001413", and a container labeled "Tear Gas Pellets, Non-Hazardous, 13-004957" outside of the less than 90-day area. The

walkthrough continued to Building X-720. Inspector Francis observed four 4-foot containers (dated 3/19/2018, 12/12/2017, 9/28/2017, and 4/5/2018) and two 8-foot containers (dated 9/28/2017) of used fluorescent lamps. At Column J10, Inspector Francis observed containers of universal waste lamps dated "3/27/2018", "4/4/2018", "2/5/2018", and "4/3/2018" and a less than 90-day accumulation area which had one 55-gallon container of used aerosol cans, D001. The walkthrough continued to the Cleaning Room. Inspector Francis observed an SAA area with polybottles. The walkthrough continued to the Air PAL Shop. Inspector Francis observed two 5-gallon SAA containers. The walkthrough continued to the Respirator Area. Ms. Moore showed Inspector Francis five 55-gallon containers of universal waste labeled "Nickel Metal Hydride" with accumulation dates of "3/19/018" and "9/18/2017". The walkthrough continued to Building X-741. Inspector Francis observed several totes and containers labeled "Used Oil". Inspector Francis noted a tote of used oil number 16-001811 and one tote labeled "CERCLA Used Oil". The walkthrough continued to Building X-623. Inspector Francis observed one 55-gallon SAA container labeled "PPE and Bag Filters, F001". The walkthrough continued to Building X-744G. Mr. Mike Campfield showed Inspector Francis a universal waste container dated "3/1/2018" in Section 5. The walkthrough continued to Building X-750. The less than 90-day accumulation area was empty. Inspector Francis observed two SAA containers labeled "Used Antifreeze" and "Solvent Rags". Inspector Francis observed six 55-gallon containers labeled "Used Oil". The outside metal storage locker contained used oil, used oil filters, and two 5-gallon SAA containers. The walkthrough continued to Building X-300. Inspector Francis observed a container of used incandescent bulbs dated "1/17/2018". The walkthrough continued Building X-744L. Ms. Moore explained to Inspector Francis that universal waste used fluorescent bulbs are brought to Building X-744L to be surveyed and packaged for off-site transportation. Inspector Francis observed containers of universal waste bulbs and a CERCLA Universal Waste Area. Inspector Francis noted containers of CERCLA universal waste bulbs with accumulation dates of "1/24/2017", "5/31/2016", "12/14/2016", "10/16/16", and "12/9/2016". In addition, Inspector Francis observed a bulb crusher and six boxes of electronic scrap. Ms. Moore told Inspector Francis that the used fluorescent lamps and electronic scrap is shipped to USA Lamp and Ballast. The walkthrough continued to Building X-710. The inspection group received a safety briefing from Ms. Debby Perez. The inspection group went to the loading dock and met Mr. Brandon Fosson. Mr. Fosson showed Inspector Francis a universal waste accumulation area. Inspector Francis observed eighteen 4-foot boxes of universal waste used fluorescent lamps with accumulation dates of "12/6/2017", "2/9/2018", and "12/16/2017". Mr. Fosson showed Inspector Francis a hazardous waste less than 90-day accumulation area. Inspector Francis observed three SAA containers in the less than 90-day area labeled "Unused Samples". Mr. Fosson told Inspector Francis they came from Room 203. Inspector Francis observed several other containers in the less than 90-day area labeled "HNO_3 Sample Prep, 4/8/2018" and "Acetone, 3/1/2018". The walkthrough continued to Room 185, Area C. Mr. Fosson showed Inspector Francis a less than 90-day area. Inspector Francis observed two containers dated "3/7/2018". Mr. Fosson showed Inspector Francis an SAA container in this area. The walkthrough continued to Room 111. Mr. Fosson showed Inspector Francis one SAA polybottle. The walkthrough continued to Room 114. Mr. Fosson showed Inspector Francis one polybottle SAA and another SAA container. The walkthrough continued to Room 113. Mr.

Fosson showed Inspector Francis a SAA container of used aerosol cans. The walkthrough continued to Room 144. Mr. Fosson showed Inspector Francis a polybottle less than 90-day area. The walkthrough continued to Room 124. Mr. Fosson showed Inspector Francis a SAA container of methanol waste. The walkthrough continued to Room 139. Mr. Fosson showed Inspector Francis another 5-gallon SAA container. The walkthrough continued to Room 157. Mr. Fosson showed Inspector Francis two polybottle SAA containers and a SAA containing waste acetone. The walkthrough continued to Room 142. Mr. Fosson showed Inspector Francis an SAA container labeled "Sodalime/Alumina". The walkthrough continued to Room 154, Water Testing Lab. Mr. Fosson showed Inspector Francis a waste container on the floor from an automated analyzer. The walkthrough continued to Room 279. Mr. Fosson showed Inspector Francis four 5-gallon SAA containers. The walkthrough continued to Room 281. Mr. Fosson showed Inspector Francis three SAA containers. The walkthrough continued to Room 285. Mr. Fosson showed Inspector Francis four SAA containers. The walkthrough continued to Room 266. Mr. Fosson showed Inspector Francis four SAA containers. The walkthrough continued to Room 263. Mr. Fosson showed Inspector Francis one 30-gallon SAA container. The walkthrough continued to Room 262. Mr. Fosson showed Inspector Francis three SAA containers. The walkthrough continued to Room 260. Mr. Fosson showed Inspector Francis four SAA containers. The walkthrough continued to Room 240. Mr. Fosson showed Inspector Francis one SAA polybottle. The walkthrough continued to Room 254, TCLP Lab. Mr. Fosson showed Inspector Francis five 5-gallon SAA containers. The walkthrough continued to Room 238. Mr. Fosson showed Inspector Francis three 5-gallon SAA containers and one 5-gallon radioactive waste container. The walkthrough continued to Room 331. Mr. Fosson showed Inspector Francis one SAA polybottle. The walkthrough continued to Room 216. Mr. Fosson showed Inspector Francis three SAA containers and one 5-gallon used oil container. The walkthrough continued to Room 203. Mr. Fosson showed Inspector Francis containers of unused samples and some containers labeled CERCLA Waste Samples. The walkthrough continued to Room 223. Mr. Fosson showed Inspector Francis an empty 5 gallon SA container. The walkthrough continued to Room 224. Mr. Fosson showed Inspector Francis an SAA container of used aerosol cans. The walkthrough continued to Room 226. Mr. Fosson showed Inspector Francis a 10-gallon SAA container. The walkthrough continued to Room 214. Mr. Fosson showed Inspector Francis a 5-gallon and 30-gallon SAA containers. The walkthrough continued to Building X-326. Mr. Bob Chancey showed Inspector Francis a CERCLA Accumulation Area that contained universal waste and hazardous waste. Inspector Francis observed a 5-gallon container labeled "Mercury Spill, 9/26/2016, D009, 16-001739", a 55-gallon container labeled "Battery Acid, D002/D008, 10/11/2016, 16-001747", and a 55-gallon container labeled "Battery Acid, 5/8/2016

On April 18, 2018, Inspector Francis arrived at Building X-1000 at approximately 7:45 a.m. Mr. Michael Daniels, Mr. Jeff Riley, and Mr. Chris Guilliams took the inspector to Building X-751 because a nitric acid spill had closed Building X-705. At Building X-751, Mr. Nate Banks showed Inspector Francis two 10-gallon containers labeled "Aerosol Cans, D001" and a 30-gallon container labeled "Used Diesel – Biodiesel" and two 55-gallon containers labeled "Used Oil". The walkthrough continued to Building X-700. Mr. Nate Banks showed Inspector Francis

a 10-gallon container labeled "Aerosol Cans", a 30-gallon container labeled "Aerosol Cans", a 55-gallon container labeled "Used Oil", and a 55-gallon container labeled "Used Antifreeze". Mr. Banks showed Inspector Francis a SAA container labeled "Paint Thinner" and a universal waste used fluorescent lamp accumulation area. Inspector Francis observed boxes of 4-foot and 8-foot used lamps labeled and dated: "1/22/2018"; "2/16/2018"; "2/18/2018"; "1/30/2018"; "3/5/2018"; and "3/20/2018". In addition, Inspector Francis observed several used lead acid batteries and several containers of electronic scrap. The walkthrough continued to another area of Building X-700. Ms. Lindsay Moore showed Inspector Francis three 30-gallon containers labeled "Used Oil" at Column D8. The walkthrough continued to Column 7BA1. Inspector Francis observed one 55-gallon container labeled of used oil and one 55-gallon container labeled "Rad". The walkthrough continued to Column E-3 in Building X-700. Ms. Moore showed Inspector Francis a universal waste accumulation area and a less than 90-day accumulation area. Inspector Francis observed a container labeled "Electronic Scrap, D008, 4/16/2018". The walkthrough continued to Building X-345. Mr. Mike Campfield showed Inspector Francis two polybottles labeled "D002, HNO_3, Te, UO, F_2, 3/19/2014" two 55-gallon containers labeled "Crushed Cans", and a container labeled "Non-Regulated Unused Samples #16-001398". The walkthrough continued in X-345 to area RCRA 1. Inspector Francis observed a container labeled "X326 D006/D008/D001/D007/D009 #F022586", and a container labeled "CERCLA Waste, D004, D007, 6/23/2016, K0173516". The walkthrough continued to Building X-344. Inspector Francis observed a universal waste container. The walkthrough continued to Building X-627. Ms. Moore showed Inspector Francis a 55-gallon container labeled "PPE, Bags, Filter F001 4/3/2018 in a less than 90-day accumulation area, and a 55-gallon SAA container labeled "F001 PPE, Bags, Filters".

The inspection group went to Building X-157A to review records.

Records Review

A records review was conducted at Building X-157A. The inspector reviewed hazardous waste manifests, universal waste, used oil shipping records, personnel training information, current version of the contingency plan, weekly inspection logs, and waste profiles. The inspector reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, and weekly inspection logs. Hazardous wastes were being shipped to: EQ Detroit/US Ecology, Detroit, Michigan (MID980991566), Michigan Waste Disposal Services, Belleville, Michigan (MID000724831), Energy Solutions Clive Treatment Facility, Clive, Utah (UTD982598898), DSSI/Permafix, Kingston, Tennessee (TND982109142), Material and Energy Corporation, Oak Ridge, Tennessee (TNR000005397), Permafix Florida, Gainesville, Florida (FLD980711071), and Environmental Protection Service, Wheeling, WV (WVD988770673). The last off-site shipment was dated April 18, 2017. Universal Waste used fluorescent lamps and electronic waste were being shipped to USA Lamp and Ballast, Cincinnati, Ohio, and the date of the last off-site shipment was April 4, 2018. Used oil was being shipped to DSSI, Kingston, Tennessee (TND982109142). Radioactive contaminated PCBs were being shipped to U.S. DOE in care of National Security Technology, LLC, Mercury, Nevada

(NV3890090001). The inspector reviewed personnel training records for Fluor-BWXT and PMA employees. The inspector reviewed a Contingency Plan that was last updated January 2018. In addition, Inspector Francis provided Ms. Moore with ten container numbers (18-001261, 15-004910, 18-000903, 17-002280, 16-001413, 13-004957, 16-001811, 16-001739, 16-001747, 16-001398, and K0173516). Ms. Moore provided Inspector Francis with the corresponding waste analysis for each container.

After the records review, the inspection continued to the on-site landfill under construction. Mr. Chris McDade, Construction Manager showed Inspector Francis the on-going construction activities.

Closing Conference

The inspector conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection and generate an inspection report. U.S. DOE and Fluor-BWXT would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, and completed inspection checklists. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and an Ohio EPA Pollution Prevention Assistance brochure to Mr. Guilliams.

Attachments
Inspection Checklists.

OHIO PART B PERMITTED FACILITY RCRA INSPECTION CHECKLIST			
FACILITY	Portsmouth Gaseous Diffusion Plant	**OHIO PERMIT #**	04-66-0680
STREET ADDRESS	3930 U.S. Route 23 South	**US EPA ID#**	OH7890008983
CITY, STATE AND ZIP	Piketon, OH 45661	**PHONE NUMBER**	740-897-5010
COUNTY	Pike	**INSPECTION DATE**	April 17-18, 2018
Was Advance Notice of Inspection Given?		Yes ☒ No ☐ N/A ☐	
If So, How Far In Advance?		One day	

	NAME	AGENCY/TITLE	PHONE
INSPECTORS	Walt Francis	U.S. EPA/Environmental Scientist	(312) 353-4921
FACILITY REPS	Amy Lawson	U.S. DOE/PMP	(740) 897-2112
	Chris Guilliams	Fluor-B&W Portsmouth, LLC/Environmental Support Services Supervisor	(740) 897-3863

Is facility operating as a generator?	Yes

If so, complete the applicable sections of the Generator Requirements checklist for wastes being managed under generator status.

PERMIT STATUS

Permit Issued:	March 25, 2011	LDR Checklist Attached:	Yes ☒ No ☐ N/A ☐
Permit Effective Date:	March 25, 2011	Used Oil Checklist Attached:	Yes ☒ No ☐ N/A ☐
Permit Expiration Date:	March 25, 2011	Generator Checklist Attached:	Yes ☒ No ☐ N/A ☐
Permit Renewal Date:			
Permit Modification Date(s):	January 15, 2016	April 5, 2016	October 20, 2017

AUTHORIZED ACTIVITIES

STORAGE		TREATMENT		DISPOSAL	
✓	Containers		Tanks		Injection Well
	Tanks		Incinerator		Landfill
	Waste Pile		Thermal Treatment		Land Application
	Surface Impoundment		Post-Closure		Surface Impoundment

☐ Post-Closure Care ☐ Corrective Action

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PROCESS DESCRIPTION

Historically, the main function of the DOE-PORTS facility was to enrich uranium for military use (nuclear submarines) and commercial reactors through a gaseous diffusion process. This involved the separation of U235 from the U238 isotope in UF6 feedstock which contains 0.711% U235. In 1993, DOE began leasing the uranium enrichment production and operations facilities at PORTS to the United States Enrichment Corporation (USEC). Uranium was enriched at the site by USEC until May 2001, at which time the production facilities were placed into a cold standby mode. During cold standby, the process buildings were maintained with a restart capability. DOE terminated the cold standby program in September 2005 and replaced it with a cold shutdown program, which no longer maintains the gaseous diffusion restart capability. The PORTS site is owned by DOE and the uranium enrichment facilities are in the process of being transitioned back to DOE from USEC. Ongoing activities at the facility include decontamination and decommissioning of facility buildings, ongoing site environmental restoration, and maintenance of the permitted hazardous waste storage area.

WASTE MANAGEMENT, GENERATION AND AMOUNT

Uranium contaminated hazardous wastes (mixed waste) which were generated by USEC and DOE are stored on-site in DOE-owned and operated hazardous waste container storage facilities for longer than one year. Historically, this was due to the limited number of TSDs in the U.S. which could accept mixed waste, and a May 1991 DOE moratorium on off-site waste shipment. A large percentage of the waste generated at PORTS is DOE-generated mixed waste from the site-wide cleanup activities. This is also stored in DOE-owned storage areas. During the past year, numerous shipments of hazardous waste were manifested off-site by both DOE and USEC. This is due to an increase in treatment capacity at off-site commercial treatment facilities and DOE treatment facilities, the lifting of the moratorium, and the execution of the site treatment plans for DOE and USEC. DOE has in the past sent some waste off-site (to USDOE Oakridge) for treatment (incineration) prior to final disposal. Treatment residuals had been returned to DOE for storage in the interim prior to their final disposal.

Hazardous

The DOE Part B permit lists numerous hazardous waste codes for wastes that are generated by the above processes and the environmental restoration. These are stored in drums ranging in size from 30 to 110 gallon capacity, 5 gallon containers, 20 gallon lab packs, 5' cans, 4'x4'x6' boxes, 4'x4'x8' boxes, polybottles and laboratory bottles.

Nonhazardous

A wide variety of radioactive and other nonhazardous wastes are generated as a result of the above processes.

REGULATORY/ENFORCEMENT HISTORY

As a result of violations of state and federal hazardous waste regulations found during the 1987, 1988, and 1989 OEPA RCRA inspections, USDOE and OEPA entered into a Consent Decree governing restoration of the environment at DOE-PORTS.

On October 4, 1995, DFFOs were signed which allowed DOE to store LDR wastes in excess of one year, so long as waste is being stored in compliance with the orders and an approved site treatment plan. These orders supersede the May 18, 1993, DFFOs. On February 24, 1998, DOE, LMES and Ohio signed DFFOs and a Consent Order regarding past violations and the management of DUF6 and LiOH. This order was amended on March 12, 2004, June 23, 2005, February 22, 2008 and March 28, 2011. The latest amendment added Fluor-B&W Portsmouth, LLC and Babcock & Wilcox Conversion Services, LLC to the order.

On March 18, 1999, DOE and Ohio EPA signed DFFOs. These DFFOs provide exemptions to DOE and integrate the following unclosed units into the CMS/CMI process: X-749, X-231B, X-701C, X701B, X-230J7, and X-744Y.

On April 13, 2010, DOE signed the Director's Final Findings and Orders for Removal Action and Remedial Investigation and Feasibility Study and Remedial Design and Remedial Action (DFF&O). The DFF&O outline the process for decontamination and decommissioning of the facility buildings. A Part B permit was issued to DOE and its current co-operator, Fluor-B&W Portsmouth, LLC, for the X-326 storage facilities on March 25, 2011. The Part B permit was modified on January 15, 2016 in order to add storage areas in buildings X-330, X-345 and X-705.

HAZARDOUS WASTE MANAGEMENT UNITS

Unit Title	Status	Inspected
~~X-326 Hazardous Waste Container Storage Unit~~	Operating Permitted Storage Unit	☐
X-330 Hazardous Waste Container Storage Unit	Permitted Storage Unit	☐
X-345 Hazardous Waste Container Storage Unit	Permitted Storage Unit	☐
X-705 Hazardous Waste Container Storage Unit	Permitted Storage Unit	☐
X-744Y Radiological Waste Storage Yard	Closure Completed; Unit Integrated into RCRA Corrective Action Program	☐
X-231B Land Treatment Unit	Corrective Action Completed; Unit Integrated into RCRA Corrective Action Program; Unit in S&M	☐
X-701B Surface Impoundment	Unit Integrated into RCRA Corrective Action Program	☐
X-735 North Landfill	Closure Completed; in Post-Closure Care	☐
X-749 North Landfill	Closure Completed; in Post-Closure Care	☐
X-616 Surface Impoundment	Closure Completed; in Post-Closure Care	☐
X-230J7 Surface Impoundment	Unit Integrated into RCRA Corrective Action Program	☐
X-701C Neutralization Pit	Closure Completed; Unit Integrated into RCRA Corrective Action Program	☐
X-744G Unrestricted Container Storage Unit	Closure Completed	☐
X-744G Restricted Container Storage Unit	Closure Completed	☐
X-752 Hazardous Waste Storage Facility	Closure Completed	☐
X-7725 Container Storage Unit	Closure Completed	☐
X-740 Waste Oil Handling Facility	Closure Completed; Building Removed	☐

GENERAL PERMIT COMPLIANCE AND ACTIVITIES

1.	Has the expiration date of the permit passed? If so:		Yes ☐ No ☒ N/A ☐
	A.	Is the permittee continuing any activity regulated by the permit after the expiration date of the permit?	Yes ☐ No ☐ N/A ☐
	B.	Has the facility submitted an application for a permit renewal to the director no later than 180 days prior to the expiration date of the permit? [Condition A.6]	Yes ☐ No ☐ N/A ☐
2.	Has the permittee submitted the annual permit fee, payable to "Treasurer, State of Ohio," to Ohio EPA on or before the anniversary of the date of issuance during the term of the permit? [Condition A.26]		Yes ☒ No ☐ N/A ☐

3.	Is the permittee conducting any hazardous waste management activities (not otherwise exempt by law) which are not authorized by the permit? [Conditions A.1(b) and A.5]				Yes ☐ No ☑ N/A ☐
4.	Have any provisions of the permit been identified as invalid? [Condition A.4]				Yes ☐ No ☑ N/A ☐
5.	Has the permittee identified any instances of noncompliance with the permit, ORC Chapter 3734 or the rules adopted thereunder, which may endanger human health or the environment? If so:				Yes ☐ No ☑ N/A ☐
	A.	Did the permittee immediately report the following to Ohio EPA's Emergency Response Unit? [Condition A.20]			
		i.	Information concerning a release of any hazardous waste that may cause an endangerment to public drinking water supplies; and		Yes ☐ No ☐ N/A ☐
		ii.	Information concerning a release of hazardous waste, fire or explosion at the facility which could threaten human health or the environment outside the facility including a description of:		Yes ☐ No ☐ N/A ☐
			a.	Name, address and telephone number of the owner/operator?	Yes ☐ No ☐ N/A ☐
			b.	Name, address and telephone number of the facility?	Yes ☐ No ☐ N/A ☐
			c.	Date, time and type of incident?	Yes ☐ No ☐ N/A ☐
			d.	Name and quantity of material(s) involved?	Yes ☐ No ☐ N/A ☐
			e.	The extent of injuries, if any?	Yes ☐ No ☐ N/A ☐
			f.	An assessment of the actual or potential hazard to the environment and human health outside the facility?	Yes ☐ No ☐ N/A ☐
			g.	Estimated quantity and disposition of recovered material that resulted from the incident?	Yes ☐ No ☐ N/A ☐
6.	Did the permittee provide a written report to Ohio EPA's Emergency Response Unit and DHWM within 5 days of becoming aware of the circumstances reported in Questions No. 5? If so, did the report contain: [Condition A.21]				Yes ☐ No ☐ N/A ☒
	A.	A description of the noncompliance and its cause (including exact dates and times)?			Yes ☐ No ☐ N/A ☐
	B.	Whether the noncompliance has been corrected and if not, the anticipated time noncompliance is expected to continue? and			Yes ☐ No ☐ N/A ☐
	C.	Steps taken or planned to minimize the impact on the environment and to reduce, eliminate and prevent recurrence of the noncompliance?			Yes ☐ No ☐ N/A ☐
NOTE: The permittee need not comply with the five day written report requirement if the director, upon good cause shown by the permittee, waives that requirement and the permittee submits a written report within 15 days of the time the permittee became aware of the circumstances. [Condition A.21]					
7.	Has the permittee identified other instances of noncompliance not provided for in Condition A.22? If so:				Yes ☐ No ☑ N/A ☐
	A.	Did the permittee report these instances to Ohio EPA, DHWM? [Condition A.22]			Yes ☐ No ☐ N/A ☐
	B.	Do the reports provided contain the information set forth in Condition A.20? [Condition A.20]			Yes ☐ No ☐ N/A ☐
	C.	Has the permittee taken all steps necessary to minimize releases to the environment or prevent any adverse impact on human health or the environment? [Condition A.8]			Yes ☐ No ☐ N/A ☐

8.	Has the permittee planned any changes in the permitted facility or activity which may result in noncompliance with the conditions of the permit?		Yes ☐ No ☒ N/A ☐
	A.	If so, has the permittee provided Ohio EPA with advance notice of such changes? [Condition A.17]	Yes ☐ No ☐ N/A ☒
NOTE: Such notification does not waive the permittee's duty to comply with the permit. [Condition A.17]			
9.	Has the permittee become aware that it failed to submit any relevant facts in the permit or issuance proceedings or that it submitted incorrect or incomplete information in permit issuance proceedings or other submissions to Ohio EPA? If so:		Yes ☐ No ☐ N/A ☒
	A.	Has the permittee properly submitted such facts or corrected information to the appropriate entity? [Condition A.24]	Yes ☐ No ☐ N/A ☒
PERMIT MODIFICATION, REVISION, REVOCATION			
10.	Has the permittee filed a request for a permit modification, revision or revocation since permit issuance? [Condition A.2] 10/2017		Yes ☒ No ☐ N/A ☐
11.	Has the permit, been transferred to a new owner/operator? If so:		Yes ☐ No ☒ N/A ☐
	A.	Has the transfer been conducted in accordance with ORC Chapter 3734 and the rules adopted thereunder which includes the permittee notifying the new owner in writing of the requirements of ORC Chapter 3734 and the rules adopted thereunder and the applicable Ohio hazardous waste rules before transferring ownership? [Condition A.18]	Yes ☐ No ☐ N/A ☒
12.	Has the permittee submitted reports in any compliance schedule of the permit to Ohio EPA no later than 14 days following each scheduled date, unless otherwise specified? [Condition A.19]		Yes ☒ No ☐ N/A ☐
13.	Has the permittee furnished relevant information which Ohio EPA has requested to determine whether cause exists for modifying, revising, revoking or suspending the permit, to determine compliance with the permit? [Condition A.10]		Yes ☒ No ☐ N/A ☐
14.	Has the facility furnished Ohio EPA, upon request, with copies of records required to be kept by the permit? [Condition A.10]		Yes ☒ No ☐ N/A ☐
15.	Is the permittee maintaining records of all data used to complete the application and any amendments, revisions or modifications to the application? [Condition A.14c]		Yes ☒ No ☐ N/A ☐
16.	Is the permittee retaining a complete copy of the approved application on-site? [Condition A.14c]		Yes ☒ No ☐ N/A ☐
17.	Is the permittee planning any physical alterations or additions to any permitted portions of the facility? If so:		Yes ☒ No ☐ N/A ☐
	A.	Has the permittee given notice to the director of such alterations/additions? [Condition A.15]	Yes ☒ No ☐ N/A ☐
SITE ENTRY - AVAILABILITY OF RECORDS			
18.	As specified in Condition A.11, has the permittee allowed the director or an authorized representative, upon proper identification to:		
	A.	Enter at reasonable times upon the premises where a regulated activity is located or where records are kept under the conditions of the permit?	Yes ☒ No ☐ N/A ☐
	B.	Have access to and copy, at reasonable times, any records required to be kept under the conditions of the permit?	Yes ☒ No ☐ N/A ☐
	C.	Inspect, at any time, facilities, equipment (including control and monitoring equipment), practices or other operations regulated under the conditions of the permit?	Yes ☒ No ☐ N/A ☐

	D.	Sample, document, photograph or monitor, at reasonable times, any substances or parameter at the location of the facility to assure compliance with the permit or as otherwise authorized by ORC Chapter 3734 and the rules adopted thereunder?	Yes ☒ No ☐ N/A ☐
RECORDKEEPING/OPERATING REQUIREMENTS			
OPERATING RECORD			
19.	In accordance with OAC rules 3745-54-73 and 3745-54-74 and Condition B.22 of the permit, does the permittee maintain an Operating Record which contains the following information:		Yes ☒ No ☐ N/A ☐
	A.	A description of the quantity of each hazardous waste and the method(s) and date(s) of its treatment or storage?	Yes ☒ No ☐ N/A ☐
	B.	The location of each hazardous waste and quantity at each location including cross-reference to specific manifest numbers?	Yes ☒ No ☐ N/A ☐
	C.	Records and results of required waste analysis?	Yes ☒ No ☐ N/A ☐
	D.	Summary reports and details of all incidents that required implementation of the contingency plan?	Yes ☒ No ☐ N/A ☐
	E.	Records and results of required inspections?	Yes ☒ No ☐ N/A ☐
	F.	Documents required to be maintained by LDR requirements of OAC Chapter 3745-270?	Yes ☒ No ☐ N/A ☐
	G.	Monitoring, testing, or analytical data, and corrective action where required, from groundwater monitoring and required monitoring of surface impoundments, landfills, waste piles and land treatment units? [3745-54-73(B)(6)]	Yes ☒ No ☐ N/A ☐
DOCUMENTS TO BE MAINTAINED AT FACILITY			
20.	In accordance with Condition A.28 of the permit, is the permittee maintaining the following documents at the facility:		
	A.	Waste analysis plan in accordance with OAC rule 3745-54-13?	Yes ☒ No ☐ N/A ☐
	B.	Contingency plan in accordance with OAC rule 3745-54-53?	Yes ☒ No ☐ N/A ☐
	C.	Personnel training plan and records required by OAC rule 3745-54-16(E)? [Condition B.6]	Yes ☒ No ☐ N/A ☐
	D.	Inspection schedules developed in accordance with OAC rules 3745-54-15, 3745-55-74 and 3745-55-95? [Condition B.5]	Yes ☒ No ☐ N/A ☐
	E.	Operating record in accordance with OAC rule 3745-54-73? [Condition B.22]	Yes ☒ No ☐ N/A ☐
21.	Is the permittee maintaining copies of all inspection logs at the facility for a period of at least 3 years from date of inspection? [Condition B.5]		Yes ☒ No ☐ N/A ☐
22.	Have any of the documents in Question No. 20 been revised? [Condition A.15] If so:		Yes ☐ No ☒ N/A ☐
	A.	Has the permittee submitted the revisions to Ohio EPA in accordance with OAC rule 3745-50-51?	Yes ☐ No ☐ N/A ☒
	B.	Have all requirements of OAC rule 3745-50-51 been met, including, where required, Ohio EPA approval?	Yes ☐ No ☐ N/A ☒

BIENNIAL REPORT REQUIREMENT			
23.	Is the permittee complying with biennial report requirements set forth in OAC rule 3745-54-75 and the additional report requirements set forth in OAC rule 3745-54-77? [Condition B.25]		Yes ☒ No ☐ N/A ☐
SAMPLING/MONITORING RECORDKEEPING REQUIREMENTS			
24.	In compliance with Condition A.12(b) of the permit, do the permittee's records of monitoring information specify the:		
	A.	Date(s), exact place(s), time(s) and method(s) of sampling or measurement?	Yes ☒ No ☐ N/A ☐
	B.	Individual(s) who performed the sampling or measurement?	Yes ☒ No ☐ N/A ☐
	C.	Date(s) analyses were performed?	Yes ☒ No ☐ N/A ☐
	D.	Individual(s) who performed the analyses?	Yes ☒ No ☐ N/A ☐
	E.	Analytical technique(s) or method(s) used?	Yes ☒ No ☐ N/A ☐
	F.	Results of such analyses?	Yes ☒ No ☐ N/A ☐
25.	Have the methods used to obtain a representative sample of the waste to be analyzed included the appropriate SW-846 method or an equivalent method specified in the approved waste analysis plan? [Condition A.12(a)]		Yes ☒ No ☐ N/A ☐
26.	In accordance with Condition A.14 of the permit, is the permittee retaining records of monitoring information as required by the permit for at least 3 years from the date of sampling, including:		
	A.	All calibration and maintenance records?	Yes ☒ No ☐ N/A ☐
27.	Has Ohio EPA requested submittal of any reports or other information from the permittee? If so:		Yes ☒ No ☐ N/A ☐
	A.	Have the submittals been signed and certified according to OAC rule 3745-50-42? [Condition A.13]	Yes ☒ No ☐ N/A ☐
WASTE MINIMIZATION REQUIREMENTS			
28.	Does the permittee certify at least once every year that a program is in place to reduce the volume and toxicity of hazardous waste generated in accordance with Condition A.29(a) of the permit and OAC rule 3745-54-73(B)(9)?		Yes ☒ No ☐ N/A ☐
29.	Did the permittee submit the waste minimization report to Ohio EPA, Office of Compliance Assistance & Pollution Prevention and South District Office within 180 days of journalization of this permit and updates every five years thereafter? [Condition A.29]		Yes ☒ No ☐ N/A ☐
30.	Has the permittee reduced the amount of waste (hazardous waste, solid waste, air emission, waste water discharges, etc.) this year generated at their facility by implementing pollution prevention/waste minimization?		Yes ☒ No ☐ N/A ☐
31.	Has the permittee saved money this year by implementing pollution prevention (reducing raw material usage, disposal fees, energy savings, etc.)?		Yes ☒ No ☐ N/A ☐
NOTE: If this facility is inspected two times a year, the information obtained in Questions 28 through 31 only needs to be collected one time for the calendar year.			

WASTE ACCEPTANCE AND GENERATION			
32.	Is the permittee storing any containers of hazardous waste received from any off-site source that permittee is not permitted to store? [Condition A.1.]		Yes ☐ No ☒ N/A ☒
33.	Has the permittee arranged to receive hazardous waste from a foreign or off-site source that the permittee is not permitted to store? [Condition A.1.]		Yes ☐ No ☒ N/A ☐
34.	Has the permittee notified the regional administrator of U.S. EPA at least four weeks prior to the date the permittee expects to receive hazardous waste from a foreign source, as required by OAC rule 3745-54-12(A)? [Condition B.2(b)]		Yes ☐ No ☐ N/A ☒
OFF-SITE SHIPMENTS/MANIFEST REQUIREMENTS			
35.	Is the permittee complying with the following manifest requirements set forth in OAC Chapter 3745-52 and OAC rules 3745-54-70, 3745-54-71, 3745-54-72 and 3745-54-76: [Condition B.24]		
	A.	All hazardous wastes shipped off-site have been accompanied by a completed manifest, U.S. EPA Form 8700-22 and, if necessary, U.S. EPA Form 8700-22A in compliance with OAC rule 3745-52-20(A)?	Yes ☒ No ☐ N/A ☐
	B.	The manifest form used contains all information required by OAC rule 3745-52-20 and the minimum number of copies required by OAC rule 3745-52-22?	Yes ☐ No ☒ N/A ☐ EPA ID # Incorrect
	C.	The permittee has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with OAC rule 3745-52-20(B)(C)(D)?	Yes ☒ No ☐ N/A ☐
	D.	Prepared manifests have been signed by the permittee and initial transporter in compliance with OAC rule 3745-52-23?	Yes ☒ No ☐ N/A ☐
36.	As a permittee that generates hazardous waste, are signed copies of all hazardous waste manifests and any documentation required for exception reports retained for at least 3 years at the facility as required by OAC rules 3745-52-40 and 3745-54-71(A)(2)(e)?		Yes ☒ No ☐ N/A ☐
NOTE: If the permittee is generating hazardous waste, remember to attach a complete generator checklist.			
37.	Does the permittee use only properly registered transporters when removing hazardous wastes? [Condition A.16]		Yes ☒ No ☐ N/A ☐
38.	Does the permittee give one copy of the manifest to the transporter, send one copy to the generator within 30 days, and keep one copy for at least 3 years? [3745-54-71(A)(2)(c)(d)(e)]		Yes ☒ No ☐ N/A ☐
	A.	If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met? [3745-54-71(B)(3)(4)(5)]	Yes ☒ No ☐ N/A ☐
	B.	Are any significant discrepancies in the manifest, as defined in OAC rule 3745-54-72(A) and (B) noted in writing on the manifest or shipping paper? [3745-54-71(A)(2)(b)] & [3745-54-71(B)(2)]	Yes ☒ No ☐ N/A ☐
39.	Does the permittee send a hazardous waste shipment to a consignment state (*i.e.*, the state in which the hazardous waste shipment will be transported and subsequently managed)? If so:		Yes ☒ No ☐ N/A ☐
	A.	Has the permittee determined whether the consignment state for a shipment regulates any additional wastes (beyond those regulated federally) as hazardous wastes under its state hazardous waste program? [3745-54-71(E)]	Yes ☒ No ☐ N/A ☐
	B.	Has the permittee determined whether the consignment state requires the permittee to submit any copies of the manifest to the state? [3745-54-71(E)]	Yes ☒ No ☐ N/A ☐
40.	If the permittee has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by OAC rule 3745-54-76(A) been submitted to the director within 15 days?		Yes ☐ No ☐ N/A ☒

WASTE ANALYSIS/WASTE ANALYSIS PLAN			
41.		Does the permittee have a detailed chemical and physical analysis of waste streams which contains all information of the waste in accordance with OAC Chapters 3745-54 to 3745-57, 3745-205 and 3745-270 and the terms and conditions of the permit? [Condition B.3]	Yes ☒ No ☐ N/A ☐
42.		Does the permittee follow the procedures described in the WAP (Section C-2E of the approved permit application)? [Condition B.3]	Yes ☒ No ☐ N/A ☐
43.		In accordance with OAC rule 3745-54-13(A)(3), does the permittee repeat the waste analysis when the process or operation generating the hazardous waste has changed? [Condition B.3]	Yes ☒ No ☐ N/A ☐
44.		**FOR OFF-SITE FACILITIES:** Are the sampling methods and procedures specified in the permittee's WAP that will be used to inspect and, if necessary, analyze each movement of hazardous waste received at the facility to ensure that it matches the identification of the waste on the manifest [3745-54-13(C)]?	Yes ☒ No ☐ N/A ☐
45.		**FOR FACILITIES OPERATING SURFACE IMPOUNDMENTS EXEMPT FROM LAND DISPOSAL RESTRICTIONS UNDER OAC rule 3745-270-04(A):**	
		Does the waste analysis plan include procedures and schedules for:	
	A.	The sampling of impoundment contents? [3745-54-13(B)(7)]	Yes ☐ No ☐ N/A ☒
	B.	The analysis of test data? [3745-65-13(B)(7)]	Yes ☐ No ☐ N/A ☐
	C.	The annual removal of residues which are not delisted or which exhibit the characteristic of a hazardous waste and either does not meet treatment standards (OAC rules 3745-270-40 to 3745-270-49) or where no treatment standards have been established? [3745-54-13(B)(7)]	Yes ☐ No ☐ N/A ☐
46.		**Where applicable:** The methods which will be used to meet additional waste analysis requirements for specific waste management methods specified in OAC rules 3745-54-17, 3745-57-14, 3745-57-41 and 3745-270-07? [3745-54-13(B)(6)]	Yes ☐ No ☐ N/A ☒
47.		Does the permittee place the results of all waste analyses in the facility operating record in accordance with OAC rule 3745-54-73?	Yes ☒ No ☐ N/A ☐
48.		Is the permittee following the inspection procedures and schedules as set forth in the permit (Section F of the approved permit application) and the requirements of OAC rules 3745-54-15(A),(C) and (D)? [Condition B.5]	Yes ☒ No ☐ N/A ☐
49.		Is the permittee following the approved inspection schedule for inspecting monitoring equipment, safety equipment, emergency equipment, security devices and operating and structural equipment as specified in OAC rule 3745-54-15(B)?	Yes ☒ No ☐ N/A ☐
	A.	Is the schedule kept at the facility? [3745-54-15(B)(2)]	Yes ☒ No ☐ N/A ☐
50.		Does the permittee remedy deterioration or any malfunctions discovered by an inspection as required by OAC rule 3745-54-15(C)? [Condition B.5]	Yes ☒ No ☐ N/A ☐
51.		In accordance with OAC rule 3745-54-15(D) and Condition B.5 of the permit, do inspection records contain the following information:	
	A.	Date and time of inspection?	Yes ☒ No ☐ N/A ☐
	B.	Name of inspector?	Yes ☒ No ☐ N/A ☐
	C.	Notation of observations made?	Yes ☒ No ☐ N/A ☐

	D.	Date and nature of any repairs or other remedial actions?	Yes ☒ No ☐ N/A ☐
SECURITY REQUIREMENTS			
52.		Is the permittee complying with the following security provisions of OAC rule 3745-54-14 and Condition B.4 of the permit: [Section F of the approved permit application]?	
	A.	Does the permittee have a 24-hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?	Yes ☒ No ☐ N/A ☐
	B.	An artificial or natural barrier (in good repair) which completely surrounds the active portion of the facility?	Yes ☒ No ☐ N/A ☐
	C.	A means to control entry, at all times, through gates or other entrances, to the active portion of the facility?	Yes ☒ No ☐ N/A ☐
53.		In accordance with OAC rule 3745-54-14(C), does the permittee have signs reading "Danger - Unauthorized Personnel Keep Out" posted at entrances of the hazardous waste container storage building number X-326, X330, X345 and X-705?	Yes ☒ No ☐ N/A ☐
FACILITY OPERATIONS			
54.		Are construction, maintenance and operation of the facility being conducted to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, ground or surface water? [3745-54-31 and Condition B.1]	Yes ☒ No ☐ N/A ☐
55.		Does the permittee properly maintain and operate the facility to achieve compliance with the terms and conditions of the permit including: [Condition A.9]	Yes ☒ No ☐ N/A ☐
	A.	Effective management practices?	Yes ☒ No ☐ N/A ☐
	B.	Adequate funding?	Yes ☒ No ☐ N/A ☐
	C.	Adequate operator staffing and training?	Yes ☒ No ☐ N/A ☐
	D.	Adequate laboratory and process controls?	Yes ☒ No ☐ N/A ☐
PERSONNEL TRAINING			
56.		Is the permittee conducting personnel training in accordance with the conditions of the permit and with the following requirements of OAC rule 3745-54-16? [Condition B.6]	Yes ☒ No ☐ N/A ☐
	A.	Does the permittee provide personnel training which includes instruction in safe equipment operation and emergency procedures and implementation of the contingency plan? [3745-54-16(A)(B)(C)]	Yes ☒ No ☐ N/A ☐
	B.	Does the permittee provide personnel training to new employees within six months after their date of employment as required by OAC rule 3745-54-16(B)?	Yes ☒ No ☐ N/A ☐
	C.	Does the permittee provide refresher training as required by OAC rule 3745-54-16(C)?	Yes ☒ No ☐ N/A ☐
NOTE: Facility personnel must take part in refresher training during each period from January 1st to December 31st. Each training must occur within 15 months after the previous training. [3745-54-16(C)]			
57.		Is the permittee maintaining personnel training records as required by OAC rule 3745-54-16(D) and Section H of the approved permit application, including: written job titles, job descriptions and documented employee training records? [Condition B.6]	Yes ☒ No ☐ N/A ☐

REQUIRED EQUIPMENT			
NOTE: Inspector may attach a list of emergency equipment. If so, the attachment document is referenced as Appendix ___.			
58.	Has the permittee equipped the facility with the following emergency equipment as required by OAC rule 3745-54-32 and Condition B.9 of the permit:		
	A.	An internal communications or alarm system?	Yes ☒ No ☐ N/A ☐
	B.	A device such as a telephone which is capable of summoning emergency assistance from local emergency authorities?	Yes ☒ No ☐ N/A ☐
	C.	Portable fire extinguishers and/or fire control equipment, spill control and decontamination equipment?	Yes ☒ No ☐ N/A ☐
	D.	Water in adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers or water spray systems?	Yes ☒ No ☐ N/A ☐
59.	Is the permittee inspecting, testing and maintaining the equipment specified in Question No. 63 to ensure its proper operating in accordance with OAC rule 3745-54-33 and Condition B.10 of the permit?		Yes ☒ No ☐ N/A ☐
60.	Whenever hazardous waste is being managed at the facility, has the permittee provided all personnel involved in the operation with immediate access to an internal alarm or emergency communication device as required by OAC rule 3745-54-34 and Condition B.11 of the permit?		Yes ☒ No ☐ N/A ☐
CONTINGENCY PLAN - EMERGENCY PROCEDURES			
61.	In compliance with Condition B.13 of the permit and OAC rule 3745-54-37(A), does the permittee:		
	A.	Familiarize emergency response agencies with the layout of the facility, associated hazards, places where personnel will normally be working, entrances and possible evacuation routes?	Yes ☒ No ☐ N/A ☐
	B.	Inform such agencies of safety equipment, supplies, proper emergency safety procedures that are applicable to the facility?	Yes ☒ No ☐ N/A ☐
	C.	Familiarize the local hospital listed in the approved application with the properties of hazardous waste handled at the facility and the types of injuries or illness that could result from fires, explosions or releases at the facility?	Yes ☒ No ☐ N/A ☐
62.	Has a state or local agency declined to enter into the arrangements set forth in OAC rule 3745-54-37(A)? If so:		Yes ☐ No ☒ N/A ☐
	A.	Has the permittee documented the refusal in the operating record as required by OAC rule 3745-54-37(B)? [Condition B.13(b)]	Yes ☐ No ☐ N/A ☐
63.	Has the permittee, in accordance with OAC rule 3745-54-53, submitted a copy of the approved contingency plan (including amendments, revisions or changes) to all local authorities, agencies and response contractors designated in the approved contingency plan? [Condition B.18(b)]		Yes ☒ No ☐ N/A ☐
64.	Has the permittee notified all parties identified in the contingency plan in writing of amendments, modifications, or revisions to the plan within 10 days of the effective date of the change in the plan? [Condition B.18(b)]		Yes ☒ No ☐ N/A ☐
65.	Has the permittee submitted a copy of the approved contingency plan and all revisions, amendments and modifications to the Ohio EPA, Division of Environmental Response and Revitalization (DERR) in accordance with OAC rule 3745-54-53? [Condition B.18(c)]		Yes ☒ No ☐ N/A ☐
66.	Is the permittee reviewing the approved contingency plan at least annually and amending the plan immediately if needed in compliance with OAC rule 3745-54-54? [Condition B.17]		Yes ☒ No ☐ N/A ☐
NOTE: Also see Question 22 to verify that any changes to the contingency plan were submitted in accordance with OAC rule 3745-50-51.			

EMERGENCY COORDINATOR			
67.	In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is an emergency coordinator on premises or on call at all times?		Yes ☒ No ☐ N/A ☐
68.	In accordance with OAC rule 3745-54-55 and Condition B.19 of the permit, is/are the emergency coordinator(s) at the facility familiar with the following:		Yes ☒ No ☐ N/A ☐
	A.	Contingency plan?	Yes ☒ No ☐ N/A ☐
	B.	Facility operations/activities?	Yes ☒ No ☐ N/A ☐
	C.	Waste characterization and location?	Yes ☒ No ☐ N/A ☐
	D.	Location of all records in the facility?	Yes ☒ No ☐ N/A ☐
	E.	Facility layout?	Yes ☒ No ☐ N/A ☐
69.	In accordance with OAC rule 3745-54-55, does/do the emergency coordinator(s) have the authority to commit the resources needed to carry out the contingency plan? [Condition B.19]		Yes ☒ No ☐ N/A ☐
70.	Does the permittee have a contingency plan for the facility that: [Condition B.15]		
	A.	Describes the actions facility shall take to comply with OAC rules 3745-54-51 through 3745-54-56 in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility?	Yes ☒ No ☐ N/A ☐
	B.	Describes arrangements agreed to by local police, fire departments, hospitals, contractors and Ohio EPA and the local emergency response team to coordinate emergency services?	Yes ☒ No ☐ N/A ☐
	C.	Includes an up-to-date list of names, addresses and phone numbers (office and home) for all persons qualified to act as emergency coordinator in the order that they will assume responsibility for coordination of emergency response?	Yes ☒ No ☐ N/A ☐
	D.	Includes a list of all emergency equipment, including fire extinguishing systems, spill control equipment, communications and alarm systems and decontamination equipment?	Yes ☒ No ☐ N/A ☐
	E.	Includes the location and a physical description of each item on the list referenced in Question No. 75(d), and a brief outline of its capabilities?	Yes ☒ No ☐ N/A ☐
	F.	Includes an evacuation plan for facility personnel describing signals to be used to begin evacuation, evacuation routes, and alternate evacuation routes, in situations where the primary routes could be blocked by releases of hazardous waste?	Yes ☒ No ☐ N/A ☐

NOTE: If the permittee already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the permittee can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The permittee may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-54-52(B)]

IMPLEMENTATION OF CONTINGENCY PLAN				
71.	Has there been a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment since the date of the last inspection? If so:			Yes ☐ No ☒ N/A ☐
NOTE: Example scenarios that could be threats to human health or the environment are provided in a DHWM guidance document on "Contingency Plan Implementation and Incident Reporting Under Ohio Hazardous Waste Rules" at: http://epa.ohio.gov/portals/32/pdf/Contingency_Plan_and_Incident_Reporting.pdf. Facility specific scenarios are included in the permittee's contingency plan.				
	A.	Did the permittee immediately implement the approved contingency plan and follow the emergency procedures described in OAC rule 3745-54-56? [Conditions B.14 and B.20]		Yes ☐ No ☐ N/A ☒
	B.	Did the permittee immediately notify Ohio EPA's emergency response team using the 24-hour toll free number (800)282-9378 providing the following information: [3745-54-56(D)(2)]		
		i.	Name and telephone number of the reporter?	Yes ☐ No ☐ N/A ☐
		ii.	Name and address of the facility?	Yes ☐ No ☐ N/A ☐
		iii.	Time and type of incident?	Yes ☐ No ☐ N/A ☐
		iv.	Name and quantity of materials involved?	Yes ☐ No ☐ N/A ☐
		v.	The extent of injuries?	Yes ☐ No ☐ N/A ☐
		vi.	The possible hazards to human health or the environment outside the facility?	Yes ☐ No ☐ N/A ☐
	C.	Did the permittee collect and manage as hazardous waste all liquid or solid material resulting from fire, explosion, released material or emergency response materials until such time as the permittee can demonstrate to Ohio EPA that such waste are not hazardous wastes? [Condition B.16]		Yes ☐ No ☐ N/A ☐
	D.	Within 15 days after the incident did the permittee submit to the director a written report of the incident? If so:		Yes ☐ No ☐ N/A ☐
		i.	Did the report contain the elements set forth in OAC rule 3745-54-56(I)? [Condition B.23]	Yes ☐ No ☐ N/A ☐
	E.	Did the permittee note in the operating record the time, date and details of any incident that required the implementation of the approved contingency plan as required by OAC rule 3745-54-56(I)? [Condition B.23]		Yes ☐ No ☐ N/A ☐
STORAGE OF HAZARDOUS WASTES IN CONTAINERS				
NOTE: The requirements of Condition C do not apply to the permittee's activities as a generator accumulating hazardous waste for <90 days per OAC rule 3745-52-34(A). Please complete the applicable sections of the Generator Requirements checklist to document compliance with activities associated with <90 day accumulation of wastes.				
CONDITION OF CONTAINERS				
72.	Are containers holding hazardous wastes in good condition as required by OAC 3745-55-71? [Condition C.3] If not:			Yes ☒ No ☐ N/A ☐
	A.	Did the permittee transfer the hazardous waste from such a container to one that is in good condition or otherwise manage the waste in a manner that complies with the conditions of the permit? [Condition C.3]		Yes ☒ No ☐ N/A ☒

73.	Does the permittee ensure that all containers used at the facility are compatible with the hazardous waste to be stored in them as required by OAC rule 3745-55-72? [Condition C.4]		Yes ☒ No ☐ N/A ☐
74.	Does the permittee keep all containers closed during storage except when it is necessary to add or remove waste as required by OAC rule 3745-55-73? [Condition C.5(b)]		Yes ☒ No ☐ N/A ☐
CONTAINERS - INSPECTIONS			
NOTE: Inspector may attach a container inspection checklist. If so, the attached document is referenced as Appendix ___.			
75.	Is the permittee inspecting the container area at least once during the period from Sunday to Saturday in accordance with OAC rule 3745-55-74 and the approved inspection schedule in Section D 1A(2) of the approved permit application to detect leaking containers and deterioration of containers and the containment system? [Condition C.8]		Yes ☒ No ☐ N/A ☐
	A.	Does the permittee note the results of these inspections in the inspection log along with any remedial action taken as required by OAC rule 3745-54-15(D)?	Yes ☒ No ☐ N/A ☐
CONTAINMENT SYSTEM			
76.	Does the permittee maintain the containment system as described in Section D of the approved permit application, including: [Condition C.6]		Yes ☒ No ☐ N/A ☐
	A.	Sufficient capacity to hold 10% of the total volume of containers or the volume of the largest container, whichever is greater?	Yes ☒ No ☐ N/A ☐
	B.	A system which is free of gaps and sufficiently impervious to contain leaks and spills?	Yes ☒ No ☐ N/A ☐
77.	Has the permittee had a spill or leak of wastes? If so:		Yes ☐ No ☒ N/A ☐
	A.	Was spilled or leaked waste removed in a timely manner? [Condition C.6(c)]	Yes ☐ No ☐ N/A ☒
NOTE: This time period is not to exceed 24 hours. [Condition C.6(c)			
AISLE SPACE			
78.	Is the permittee maintaining adequate aisle space to allow unobstructed movement of personnel and equipment in the event of an emergency as required by OAC rule 3745-54-35 and Condition B.12 of the permit?		Yes ☒ No ☐ N/A ☐

LARGE QUANTITY GENERATOR CHECKLIST

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month. 1 kg ~ 1 quart

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Special Safety Equipment Requirements other than level D:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes ☒ No ☐ N/A ☐
2.	Are records of all waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes ☒ No ☐ N/A ☐
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes ☒ No ☐ N/A ☐
4.	Were biennial reports filed with Ohio EPA on or before March 1st? [3745-52-41(A)] (filed on even years for previous year)	Yes ☒ No ☐ N/A ☐
5.	Are biennial reports kept on file for at least 3 years? [3745-52-40(B)]	Yes ☒ No ☐ N/A ☐
6.	Has the generator transported or caused to be transported hazardous waste to **other** than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes ☐ No ☒ N/A ☐
7.	Has the generator disposed of hazardous waste **on-site without a permit** or at another facility **other** than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes ☐ No ☒ N/A ☐
8.	Does the generator accumulate hazardous waste in containers, tanks, drip pads or containment buildings? 3745-52-34(A)(1)(a), (b), (c), (d)	Yes ☒ No ☐ N/A ☐

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)? NONE NON CERCLA WASTE	Yes ☐ No ☒ N/A ☐

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

RMK	

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☐
	b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☐
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☐
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☐
NOTE: Complete appropriate checklist for each unit.			
NOTE: If waste is treated to meet LDRs, use LDR checklist.			
SATELLITE ACCUMULATION AREA REQUIREMENTS			
11.	Does the generator ensure that satellite accumulation area(s):		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☐
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)] Bldg X-710 SAA #17	Yes ☐ No ☐ N/A ☐
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☐
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes ☐ No ☐ N/A ☐
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes ☐ No ☐ N/A ☐
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes ☐ No ☐ N/A ☐
12.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes ☐ No ☐ N/A ☐
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☐
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55-gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes ☐ No ☐ N/A ☐
NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.			

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS			
13.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes ☒ No ☐ N/A ☐
14.	Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? [3745-52-34(A)(2)]		Yes ☒ No ☐ N/A ☐
15.	Are hazardous wastes stored in containers which are:		
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes ☒ No ☐ N/A ☐
	b.	In good condition? [3745-66-71]	Yes ☒ No ☐ N/A ☐
	c.	Compatible with wastes stored in them? [3745-66-72]	Yes ☒ No ☐ N/A ☐
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes ☒ No ☐ N/A ☐
NOTE: Record location on process summary sheets, photograph the area, and record on facility map.			
16.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74] (If waste is onsite all year there should be a minimum of 52 inspections reports)		Yes ☒ No ☐ N/A ☐
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes ☒ No ☐ N/A ☐
17.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes ☒ No ☐ N/A ☐
18.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes ☒ No ☐ N/A ☐
19.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes ☐ No ☐ N/A ☒

In General:

Acids must be segregated from ignitables.
Acids must be segregated from caustics.
Corrosives should be segregated from flammables.
Oxidizers should be segregated from EVERYTHING.
Many corrosives are water-reactive.
Most reactive organics must be segregated from inorganic reactive (metals).

INCOMPATIBLE WASTES - Some Deadly Combinations –

Acids + Oil or Grease = FIRE
Acids + Caustics = HEAT/SPATTERING
Caustics + Epoxies = EXTREME HEAT
Chlorine Gas + Acetylene = EXPLOSION
Flammable Liquids + Hydrogen Peroxide = FIRE/EXPLOSION
Aluminum Powder + Ammonium Nitrate = EXPLOSION
Sodium Cyanide + Sulfuric Acid = LETHAL GAS
Ammonia + Bleach = LETHAL GAS

20.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes ☐ No ☐ N/A ☒
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.		
21.	Has the generator has closed a <90-day accumulation area since the last Inspection?	Yes ☒ No ☐ N/A ☐
22.	If "Yes" has the company has met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes ☒ No ☐ N/A ☐
NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90-day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]		
PRE-TRANSPORT REQUIREMENTS		
23.	Is the generator aware of the applicable DOT regulations for the packaging/ labeling requirements for the transport of its hazardous waste under 49 CFR Parts173, 49 CFR Part 178, and 49 CFR Part 179 (tank cars) [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes ☒ No ☐ N/A ☐
24.	Does each container ≤119 gallons have a completed hazardous waste label used in transportation with the following words and information displayed in accordance with the requirements of 49 CFR 172.304? [3745-52-32(B)] "Hazardous waste - Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, or the United States Environmental Protection Agency. Generator's name and address _____ Generator's U.S. EPA identification number Manifest document number _____."	Yes ☒ No ☐ N/A ☐
25.	Is the generator aware of the applicable DOT regulations for the proper placarding of their hazardous waste with the initial transporter for off-site transportation per 40 CFR 172 Subpart F? [3745-52-33]	Yes ☒ No ☐ N/A ☐
RMK		

MANIFEST REQUIREMENTS			
26.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]		Yes ☒ No ☐ N/A ☐
27.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]		Yes ☒ No ☐ N/A ☐
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations, items (21) through (35) must also be completed. [3745-52-20(A)(1)]			
28.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]		Yes ☒ No ☐ N/A ☐
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]			
29.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]		Yes ☐ No ☐ N/A ☒
30.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]		Yes ☒ No ☐ N/A ☐
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.			
31.	If the generator received a rejected load or residue, did the generator:		
	a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)	Yes ☐ No ☐ N/A ☒
	b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes ☐ No ☐ N/A ☒
	c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes ☐ No ☐ N/A ☒
RMK			

32.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes ☐ No ☐ N/A ☒
33.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes ☐ No ☐ N/A ☑
34.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes ☒ No ☐ N/A ☐

NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]

NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.

35.	Does the generator export hazardous waste? If so:		Yes ☐ No ☒ N/A ☐
	a.	Has the generator notified U.S. EPA of export activity? ~~3745-52-53(A)~~ CFR: 262.53	Yes ☐ No ☐ N/A ☐
	b.	Has the generator complied with special manifest requirements? ~~[3745-52-54]~~ CFR 262.54	Yes ☐ No ☐ N/A ☐
	c.	For manifests that have not been returned to the generator: has an exception report been filed? ~~[3745-52-55]~~ CFR 262.55	Yes ☐ No ☐ N/A ☐
	d.	Has an annual report been submitted to U.S. EPA? ~~[3745-52-56]~~ CFR 262.56	Yes ☐ No ☐ N/A ☐
	e.	Are export related documents being maintained on-site? ~~[3745-52-57(A)]~~ CFR 262.57	Yes ☐ No ☐ N/A ☐

NOTE: Ohio's rules have been rescinded. If you observe that the company is not in compliance with the federal rules about exporting hazardous waste, specifically that they do not have a U.S. EPA "Acknowledgment of Consent", contact the HWCIS supervisor about forwarding this information to US. EPA.

RMK	

PERSONNEL TRAINING			
36.	Does the generator keep records and documentation of:		
	a.	Job titles for each position at the facility related to hazardous waste management, and the name of the employee filling each job? [3745-65-16(D)(1)]	Yes ☒ No ☐ N/A ☐
	b.	A written job description for each position listed under a Job title description? [3745-65-16(D)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule? [3745-65-16(D)(3)]	Yes ☒ No ☐ N/A ☐
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes ☒ No ☐ N/A ☐
37.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes ☒ No ☐ N/A ☐
NOTE: There is a section at the end of the checklist which can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the -job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.			
38.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]		Yes ☒ No ☐ N/A ☐
39.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]		Yes ☒ No ☐ N/A ☐
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]			
40.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]		Yes ☒ No ☐ N/A ☐
RMK			

41.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]		Yes ☒ No ☐ N/A ☐
42.	Does the generator provide refresher training to employees during each period from January 1st to December 31st and does each training occur within 15 months after the previous training? [3745-65-16(C)]		Yes ☒ No ☐ N/A ☐
EMERGENCY PROCEDURES			
43.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:		Yes ☐ No ☒ N/A ☐
	a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes ☐ No ☐ N/A ☒
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes ☐ No ☐ N/A ☐
	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes ☐ No ☐ N/A ☐
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.			
PREPAREDNESS AND PREVENTION			
44.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]		Yes ☒ No ☐ N/A ☐
45.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:		
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes ☒ No ☐ N/A ☐
	b.	Emergency communication device? [3745-65-32(B)]	Yes ☒ No ☐ N/A ☐
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes ☒ No ☐ N/A ☐
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes ☒ No ☐ N/A ☐
NOTE: Verify that the equipment is listed in the contingency plan.			
RMK			

46.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33	Yes ☒ No ☐ N/A ☐
47.	Is emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes ☒ No ☐ N/A ☐
48.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes ☒ No ☐ N/A ☐
49.	If there is only one employee on the premises, is there immediate access to a device (ex. phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes ☒ No ☐ N/A ☐
50.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes ☒ No ☐ N/A ☐
51.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes ☒ No ☐ N/A ☐
52.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes ☐ No ☐ N/A ☑
RMK		

CONTINGENCY PLAN			
53.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]		Yes ☒ No ☐ N/A ☐
54.	Does the plan describe the following:		
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes ☒ No ☐ N/A ☐
	b.	Arrangements with local police departments, fire departments, hospitals, contractors, state and local emergency response teams to coordinate emergency services? [3745-65-52(C)]	Yes ☒ No ☐ N/A ☐
	c.	A current list of names, home addresses and telephone numbers (home or cellular telephone numbers) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes ☒ No ☐ N/A ☐
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes ☒ No ☐ N/A ☐
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes ☒ No ☐ N/A ☐
NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]			
55.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]		Yes ☒ No ☐ N/A ☐
56.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]		Yes ☒ No ☐ N/A ☐
57.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]		Yes ☒ No ☐ N/A ☐
NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.			
RMK			

PERSONNEL TRAINING FOR EMPLOYEES INVOLVED WITH HAZARDOUS WASTE MANAGEMENT		
Job Performed (ex. painter, conducts weekly inspections, signs manifests, etc.)	Name of Employee	Date Trained
Contract Manager	Kevin Ownby	11/15/16
Brandon Fossen	[illegible] Field	11/23/17
Waste Program Mgr	Brent Hayward	10/15/17
Waste Engineering Field	Lindsay [illegible]	8/30/17
Env Prot Engineer	Jeff Riley	7/12/18
Env Specialist	Nate Bullock	8/28/17
Facility Mgmt. - Mechanic	Greg Trevor	2/22/18

LARGE QUANTITY HANDLER
UNIVERSAL WASTE REQUIREMENTS

Large Quantity Handler Universal Waste (LQHUW) = 5,000 Kg or more, aggregate total

Small Quantity Handler Universal Waste (SQHUW) = less than 5,000 Kg, aggregate total

Mark each type of Universal Waste Generated at the facility and attach appropriate checklist

A. Batteries ☒ B. Pesticides ☐ C. Mercury Containing Equipment ☐ D. Lamps ☒

E. Aerosol Cans ☐ F. Antifreeze ☐ G. Paint and paint-related waste ☐

GENERAL REQUIREMENTS			
1.	Has the LQHUW obtained a U.S. EPA Identification number before exceeding 5,000 kg limit? [3745-273-32(A)(1)]		Yes ☒ No ☐ N/A ☐
PROHIBITIONS			
2.	Did the LQHUW dispose of universal waste? [3745-273-31(A)]		Yes ☐ No ☒ N/A ☐
3.	Did the LQHUW dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-37 or managing specific wastes as provided in OAC rule 3745-273-33? [3745-273-31(B)]		Yes ☐ No ☒ N/A ☐
ACCUMULATION TIME			
4	Is the LQHUW accumulating UW for less than one year? [3745-273-35(A)]		Yes ☐ No ☒ N/A ☐
	a.	If NO, has the LQHUW accumulated the UW for more than one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate.) [3745-273-35(B)]	Yes ☐ No ☒ N/A ☐
NOTE: Accumulation is defined as date generated or date received from another handler.			
5	Is the LQHUW able to demonstrate the length of time the universal waste has been accumulated? [3745-273-35(C)] If yes, describe below:		Yes ☒ No ☐ N/A ☐
EMPLOYEE TRAINING			
6	Does the the LQHUW ensure that the employees are thoroughly familiar with universal waste handling/emergency procedures, relative to their responsibilities? [3745-273-36]		Yes ☒ No ☐ N/A ☐
RESPONSE TO RELEASES			
7	Does the the LQHUW immediately contain releases of universal waste and other residues from UW immediately? [3745-273-37(A)]		Yes ☒ No ☐ N/A ☐
8	Does the the LQHUW characterize the released material? [3745-273-37(B)]		Yes ☒ No ☐ N/A ☐
9	If the material released is a hazardous waste, does the the LQHUW manage the residue as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-37(B)]		Yes ☒ No ☐ N/A ☐ If applicable complete the appropriate generator checklist.
RMK			

OFF-SITE SHIPMENTS			
NOTE: If a LQHUW self-transports wastes, then the handler must comply with the Universal Waste transporter requirements found in 3745-273-50 to 56. If acting as a transporter attach the transporter requirements checklist.			
10	Does the the LQHUW ensure that universal wastes are sent to either another handler, destination facility or foreign destination? [3745-273-38(A)]		Yes ☑ No ☐ N/A ☐
	If a large quantity handler of universal waste self-transports universal waste offsite, the handler becomes a universal waste transporter for those self transportation activities.		
11	Does the the LQHUW comply with the transporter requirements of rules 3745-273-50 to 3745-273-56 of the Administrative Code while transporting the universal waste? [3745-273-38(B)]		Yes ☒ No ☐ N/A ☐
	If a universal waste is being offered for off-site transportation, it meets the definition of hazardous materials under 49 CFR 171-180		
12	Does the the LQHUW package, label, mark, and placard the shipment, and prepare the proper shipping papers in accordance with the applicable department of transportation regulations under 49 CFR parts 172 to 180? [3745-273-38(C)]		Yes ☑ No ☐ N/A ☐
13	Prior to shipping universal waste off-site, does the originating LQHUW ensure that the receiver agrees to receive the shipment? [3745-273-38(D)]		Yes ☒ No ☐ N/A ☐
14	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☒ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where shipment was sent? [3745-273-38(E)]	Yes ☐ No ☐ N/A ☒
15	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler to discuss and do one of the following:		Yes ☐ No ☐ N/A ☑
	a.	Does the the LQHUW send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-38(F)]	Yes ☐ No ☐ N/A ☑
16	If the handler received a shipment of hazardous waste that was not a universal waste, did the LQHUW immediately notify Ohio EPA? [3745-273-38(G)]		Yes ☐ No ☐ N/A ☑
TRACKING UNIVERSAL WASTE SHIPMENTS			
17	Has the LQHUW received universal wastes from another handler? If so:		Yes ☐ No ☒ N/A ☐
	a.	Is a record (log, invoice, manifest, bill of lading, or other shipping document) of each shipment kept? [3745-273-39(A)]	Yes ☐ No ☐ N/A ☒
RMK			

18	Does the LQHUW records include the following:		
	a.	Name and address of the originating handler or foreign shipper? [3745-273-39(A)(1)]	Yes ☒ No ☐ N/A ☐
	b.	The quantity of each type of universal waste? [3745-273-39(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	The date received? [3745-273-39(A)(3)]	Yes ☒ No ☐ N/A ☐
19	Does the LQHUW ship their universal waste shipped to another handler? If so:		Yes ☒ No ☐ N/A ☐
	a.	Is a record of each shipment kept? [3745-273-39(B)]	Yes ☒ No ☐ N/A ☐
20	Does the record include the following?		
	a.	Name and address of universal waste handler, destination facility, or foreign destination? [3745-273-39(B)(1)]	Yes ☒ No ☐ N/A ☐
	b.	The quantity of each type of universal waste? [3745-273-39(B)(2)]	Yes ☒ No ☐ N/A ☐
	c.	The date shipped? [3745-273-39(B)(3)]	Yes ☒ No ☐ N/A ☐
21	Are records kept for three years? [3745-273-39(C)(1)&(2)]		Yes ☒ No ☐ N/A ☐

EXPORTS

NOTE: Large quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Large quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-40]

NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.

RMK	

Note: The following requirements apply to LQHUW who manage specific categories of UW			
A. ☐ UNIVERSAL WASTE BATTERIES			
1	Does the LQHUW contain batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-33(A)(1)]		Yes ☒ No ☐ N/A ☐
2	Has the LQHUW maintain containers of batteries that are closed, structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(A)(1)]		Yes ☑ No ☐ N/A ☐
3	Is the LQHUW conducting any of the following activities listed below as long as the casing of each individual battery cell is not breached and remains intact and closed (except that cells may be opened to remove electrolyte but must be immediately closed after removal)? [3745-273-33(A)]		Yes ☐ No ☑ N/A ☐
	☐ (a) Sorting batteries by type;	☐ (b) Mixing battery types in one container;	
	☐ (c) Discharging batteries so as to remove the electric charge;	☐ (d) Regenerating used batteries;	
	☐ (e) Disassembling batteries or battery packs into individual batteries or cells;	☐ (f) Removing batteries from consumer products; or	
	☐ (g) Removing electrolyte from batteries.		
4	Does the LQHUW who removes electrolyte from batteries, or who generates other waste (e.g., battery pack materials, discarded consumer products) as a result of the activities listed above, have they determined whether the electrolyte or other waste exhibit a characteristic of hazardous waste identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code? [3745-273-33(A)(3)]		Yes ☐ No ☐ N/A ☒
	a	If the electrolyte or other waste is characteristic, did the LQHUW managed it in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-33(A)(3)(a)]	Yes ☐ No ☐ N/A ☑ If applicable complete the appropriate generator checklist.
	b	If the electrolyte or other waste is not hazardous, did the LQHUW managed it in compliance with applicable law? [3745-273-33(A)(3)(b)]	Yes ☐ No ☐ N/A ☒
5	Did the LQHUW label the batteries or containers of batteries with the words "Universal Waste-Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-34(A)]		Yes ☑ No ☐ N/A ☐
RMK			

B. ☐ UNIVERSAL WASTE PESTICIDES			
1	Does the LQHUW prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-33(B)(1)]		Yes ☐ No ☐ N/A ☑
2	If the original pesticide container is in poor condition, did the LQHUW over-pack it into an acceptable container? [3745-273-33(B)(2)]		Yes ☐ No ☐ N/A ☐
3	If the pesticide is stored in a tank, does the LQHUW meet the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? [3745-273-33(B)(3)]		Yes ☐ No ☐ N/A ☐ If tanks are used complete the appropriate SQG tank checklist
4	If pesticides are stored in a transport vehicle, did the LQHUW ensure that it is closed, structurally sound, compatible with the pesticide(s), and lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-33(B)(4)]		Yes ☐ No ☐ N/A ☐
5	Is the LQHUW storing recalled universal waste pesticides containers, (or multiple container package unit), tank, transport vehicle or vessel in which recalled universal waste pesticides as described in paragraph (A)(1) of rule 3745-273-03 of the Administrative Code and are the containers labeled or marked clearly with both: [3745-273-34 (B)(1)&(2)]		
	a.	The label that was on or accompanied the product as sold or distributed; and [3745-273-34 (B)(1)]	Yes ☐ No ☐ N/A ☐
	b.	The words "Universal Waste - Pesticide(s)" or "Waste- Pesticide(s);" [3745-273-34 (B)(2)]	Yes ☐ No ☐ N/A ☐
6	Is the LQHUW storing **unused pesticide** products (as described in paragraph (A)(2) of rule 3745-273-03) that are in containers, tanks, or transport vehicles labeled or marked clearly with both 1(i, or ii, or iii) & 2:		
	A	Labeling	
	i	The label that was on the product when purchased, if still legible; [3745-273-34 (C)(1)(a)]	Yes ☐ No ☐ N/A ☐
	ii	If using the labels described in paragraph (C)(1)(a) of this rule is not feasible, the appropriate label as required under the department of transportation regulation 49 CFR Part 172; [3745-273-34 (C)(1)(b)]	Yes ☐ No ☐ N/A ☐
	iii	If using the labels described in paragraphs (C)(1)(a) and (C)(1)(b) of this rule is not feasible, another label prescribed or designated by the waste pesticide collection program administered by a state; and [3745-273-34 (C)(1)(c)]	Yes ☐ No ☐ N/A ☐
	B	The words "Universal Waste - pesticide(s)" or "Waste- Pesticide(s). [3745-273-34 (C)(2)]	Yes ☐ No ☐ N/A ☐
RMK			

C. ☐ UNIVERSAL WASTE MERCURY- CONTAINING EQUIPMENT			
	A LQHUW waste shall manage universal waste mercury-containing equipment in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows		
1	Does the LQHUW place any universal waste mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container? Is that container closed, structurally sound, compatible with the contents of the device, shall lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and shall be reasonably designed to prevent the escape of mercury into the environment by volatilization or any other means.? [3745-273-33(C)(1)]		Yes ☒ No ☐ N/A ☐
2	A LQHUW may remove mercury-containing ampules from universal waste mercury-containing equipment provided the handler does all of the following:: [3745-273-33(C)(2)]		
	a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-33(C)(2)(a)&(b)]	Yes ☐ No ☐ N/A ☐
	b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-33(C)(2)(c)&(d)]	Yes ☐ No ☐ N/A ☐
	c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-33(C)(2)(e)]	Yes ☐ No ☐ N/A ☐
	d.	Ensure that employees are thoroughly familiar with proper waste handling and emergency procedures? [3745-273-33 C)(2)(f)]	Yes ☐ No ☐ N/A ☐
	e.	Ensure removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-33 C)(2)(g)]	Yes ☐ No ☐ N/A ☐
	f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-33 C)(2)(h)]	Yes ☐ No ☐ N/A ☐
3	A LQHUW mercury-containing equipment that does not contain an ampule may remove the open original housing holding the mercury from universal waste mercury-containing equipment provided the handler: [3745-273-33 C)(3)]		
	a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-33 C)(3)(a)]	Yes ☐ No ☐ N/A ☐
	b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-33(C)(2)? [3745-273-33(C)(3)(b)]	Yes ☐ No ☐ N/A ☐
RMK			

4	When a LQHUW removes mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing has the handler determined whether the following exhibit a characteristic of hazardous waste identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code? [3745-273-33(C)(4)(a)]		Yes ☒ No ☐ N/A ☐
	a.	Mercury or clean-up residues resulting from spills or leaks [3745-273-33(C)(4)(a)(i)]	Yes ☒ No ☐ N/A ☐
	b.	Other waste generated as a result of the removal of mercury-containing ampules or housings (e.g., the remaining mercury-containing device). [3745-273-33(C)(4)(a)(ii)]	Yes ☒ No ☐ N/A ☐
5	If the residues, and/or wastes are characteristic, does the LQUWH manage it in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? [3745-273-33(C)(4)(b)]		Yes ☒ No ☐ N/A ☐ If applicable complete the appropriate generator checklist.
	Note: (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52)		
	Note: If the mercury, residues, or other waste is not hazardous, the handler may manage the waste in any way that is in compliance with applicable law.		
6	Does the LQUWH label the mercury-containing equipment or containers of mercury-containing equipment with either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-273-34(D)(1)]		Yes ☒ No ☐ N/A ☐
7	Does the LQUWH label the mercury-containing thermostats or containers containing ONLY thermostats with either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)?" [3745-273-34(D)(2)]		Yes ☒ No ☐ N/A ☐
RMK			

D. ☐ UNIVERSAL WASTE LAMPS		
1	Does the LQHUW contain lamps in containers, cabinets or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-33(D)(1)]	Yes ☒ No ☐ N/A ☐
2	Does the LQHUW immediately clean up and place in a container any lamp that is broken and shall place in a container any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers shall be closed, structurally sound, compatible with the contents of the lamps, and shall lack evidence of leakage, spillage, or damage that could cause leakage or releases of mercury or hazardous constituents to the environment? [3745-273-33(D)(2)]	Yes ☒ No ☐ N/A ☐
*NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities as provided in rule 3745-273-33 of the Administrative Code. [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*		
3	Does the LQHUW label the lamps or containers or packages of lamps with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamps?" [3745-273-34(D)]	Yes ☒ No ☐ N/A ☐
RMK		

OHIO SPECIFIC UNIVERSAL WASTE		
E. UNIVERSAL AEROSOL CONTAINERS 3745-273		
APPLICABILITY 3745-273-89		
1	Chapter 3745-273 of the Administrative Code applies to persons managing "aerosol containers" as defined in rule 3745-273-09 of the Administrative Code, except as provided in paragraph (A)(2) of this rule.	
2	Chapter 3745-273 of the Administrative Code does not apply to persons managing the following aerosol containers:	
	a	Aerosol containers that are not yet a waste under Chapter 3745-51 of the Administrative Code. Paragraph (A)(3) of this rule describes when an aerosol container becomes a waste.
	b	Aerosol containers that are not a hazardous waste. An aerosol container is a hazardous waste if the contents of the container exhibit one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or if the contents of the container are listed in rules 3745-51-30 to 3745-51-35 of the Administrative Code. An aerosol container is not a reactive hazardous waste unless the contents meet the description of "reactivity" in rule 3745-51-23 of the Administrative Code.
	c	Aerosol containers that are empty according to rule 3745-51-07 of the Administrative Code.
3	**Generation of universal waste aerosol containers**	
	a	A used, nonempty aerosol container becomes a waste on the date such container is "discarded" as defined in rule 3745-51-02 of the Administrative Code, or on the date such container is not operational.
	b	An unused aerosol container becomes a waste on the date the handler decides to discard it.

E.☐ AEROSOL CONTAINERS				
	A LQHUW shall manage universal waste aerosol containers in a way that prevents releases of any universal waste or any component of a universal waste to the environment, as follows:			
1	Is the LQHUW storing aerosol containers in a cabinet, hopper, container or other unit such as a table top or shelving unit that is structurally sound and compatible with the contents of the containers and that lacks evidence of leakage? [3745-273-33 (E)(1)]			Yes ☐ No ☑ N/A ☐
2	Is the LQHUW who initially collects aerosol containers at a universal waste satellite accumulation area prior to moving the aerosol containers to a specified accumulation area for storage, puncturing, or shipment off-site moving the satellite accumulation container to the specified accumulation area prior to the capacity of the satellite accumulation area being exceeded? [3745-273-33 (E)(2)]			Yes ☐ No ☐ N/A ☐
3	Has the LQHUW immediately emptied a leaking aerosol container of the container's contents in accordance with paragraph (E) (4) of this rule individually overpack the leaking aerosol container in a container having enough absorbent material to absorb the leaking contents of the aerosol container? [3745-273-33 (E)(3)]			Yes ☐ No ☐ N/A ☐
4	A LQHUW may puncture or crush an aerosol container to remove and collect the contents of the aerosol container rendering the container empty provided the handler does the following:			
	a	Is the LQHUW using commercially available equipment, or equipment specifically custom designed or retrofitted according to accepted engineering practices based on established codes, standards, published technical reports, or similar peer reviewed documents, to puncture or crush and empty aerosol containers within an enclosed compartment? [3745-273-33 (E)(4)(a)]		Yes ☐ No ☐ N/A ☐
	b	Is the LQHUW using puncturing or crushing equipment that has sufficient processing capacity to puncture or crush the quantity of aerosol containers received or generated within one year? [3745-273-33 (E)(4)(b)]		Yes ☐ No ☐ N/A ☐
	c	The large quantity handler of universal waste shall ensure that puncturing or crushing equipment meets the following conditions:		
		i	Is the equipment located in a well-ventilated area? [3745-273-33 (E)(4)(c)(i)]	Yes ☐ No ☐ N/A ☐
		ii	Is the equipment protected from an ignition source? [3745-273-33 (E)(4)(c)(ii)]	Yes ☐ No ☐ N/A ☐
		iii	Is the equipment connected to a container or tank to collect liquids released from the aerosol container? [3745-273-33 (E)(4)(c)(iii)]	Yes ☐ No ☐ N/A ☐
	d	Is the LQHUW maintaining the puncturing or crushing equipment and replacing air filters according to the manufacturer's specifications? [3745-273-33 (E)(4)(d)]		Yes ☐ No ☐ N/A ☐
RMK				

4	e	Did the LQHUW determine if the collected liquids, except for liquids consisting solely of paint, and air filters meet the definition of "hazardous waste" according to Chapter 3745-51 of the Administrative Code? [3745-273-33 (E)(4)(e)] If the collected liquids or air filters meet the definition of hazardous waste, the handler is the generator of the hazardous waste and is subject to Chapter [3745-52-11]	Yes ☐ No ☐ N/A ☒ If applicable complete the appropriate generator checklist.
The collected liquids, except for liquids consisting solely of paint, and air filters are not classified as universal waste for the purposes of this rule, the empty containers may be recycled.			
Comment: Liquids consisting solely of paint from aerosol containers are eligible to be classified and managed as a universal waste paint in accordance with Chapter 3745-273 of the Administrative Code.]			
	f	Does the LQHUW train each operator of the aerosol container puncturing or crushing equipment regarding the safe and proper operation of the puncturing or crushing equipment, the maintenance of the unit, the segregation of incompatible wastes and the identification of aerosol containers for which puncturing, or crushing may not be appropriate? [3745-273-33 (E)(4)(f)]	Yes ☐ No ☐ N/A ☐
Comment: Large quantity handlers of universal waste who use aerosol container puncturing or crushing units may be subject to requirements of the Clean Air Act or the Occupational Safety and Health Act.			
5	Does the LQHUW manage aerosol containers that are ignitable or reactive in accordance with the following:		
	a	Does the LQHUW comply with Rule 3745-66-76 of the Administrative Code or obtain written approval from the authority having jurisdiction over the local fire code allowing alternative aerosol container storage less than fifty feet from the facility's property line? [3745-273-33 (E)(5)(a)] Is the written approval maintained by the LQHUW on-site for as long as ignitable or reactive aerosol containers are managed on-site?	Yes ☐ No ☐ N/A ☐
	b	Does the LQHUW comply with Rule 3745-65-17 of the Administrative Code? [3745-273-33 (E)(5)(b)]	Yes ☐ No ☐ N/A ☐ If applicable complete the appropriate generator checklist.
6	Does the LQHUW manage aerosol containers that are incompatible in accordance with rule 3745-66-77 of the Administrative Code? [3745-273-33 (E)(6)]		Yes ☐ No ☐ N/A ☐ If applicable complete the appropriate generator checklist.
7	Does the LQHUW design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of universal waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment? [3745-273-33 (E)(7)]		Yes ☐ No ☐ N/A ☐
UNIVERSAL WASTE AEROSOL CONTAINER LABELING			
8	Is each universal waste aerosol container, multiple aerosol container package, cabinet, or other unit in which the aerosol containers are accumulated shall be labeled with words that identify the contents of the unit (for example, universal waste aerosol containers, used aerosol containers, recyclable aerosol containers). [3745-273-34 (E)(7)] This provision also applies to collection units used in universal waste satellite accumulation areas?		Yes ☐ No ☐ N/A ☐
RMK			

F. UNIVERSAL WASTE ANTIFREEZE 3745-273		
APPLICABILITY 3745-273-89		
1	Chapter 3745-273 of the Administrative Code applies to persons managing "antifreeze" as defined in rule 3745-273-09 of the Administrative Code, except as provided in paragraph (B)(2) of this rule:	
2	Chapter 3745-273 of the Administrative Code does not apply to persons managing the following antifreeze:	
	a	Antifreeze that is not yet a waste under Chapter 3745-51 of the Administrative Code. Paragraph (B)(3) of this rule describes when antifreeze becomes a waste [3745-273-89
	b	Antifreeze, including aggregated antifreeze batches, that is not a hazardous waste. Antifreeze is a hazardous waste if the antifreeze exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or if the antifreeze is contaminated with a listed hazardous waste as identified in rules 3745-51-30 to 3745-51-35 of the Administrative Code [3745-273-89
	c	Antifreeze that subsequent to generation is mixed with "used oil" as defined in rule 3745-279-01 of the Administrative Code, or is mixed with another waste that exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or is mixed with one or more of the listed hazardous wastes identified in rules 3745-51-30 to 3745-51-35 of the Administrative Code [3745-273-89
3	**Generation of universal waste antifreeze**	
	a	Used antifreeze becomes a waste on the date the used antifreeze is "discarded" as defined in rule 3745-51-02 of the Administrative Code [3745-273-89
	b	Unused antifreeze becomes a waste on the date the handler decides to discard the unused antifreeze [3745-273-89

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Specific Gravity of Antifreeze 1.15

1.15 x 8.345 = 9.6 lbs./g

9.6 lbs./g x 55 g/drum = 528 lbs./drum

5000 kg x 2.2 lbs./kg = 11000 lbs.

11000 lbs. / 528 lbs./drum is approximately = 20.8 drums

F. ☐ UNIVERSAL WAGE ANTIFREEZE			
	A large quantity handler of universal waste shall manage universal waste antifreeze in a way that prevents releases of any universal waste or any component of a universal waste to the environment, as follows:		
1	Does the LQHUW store antifreeze in containers or tanks that are structurally sound and compatible with the antifreeze. Such containers and tanks shall lack leakage or damage, including severe corrosion, which could cause leakage under reasonably foreseeable conditions? [3745-273-33 (F)(1)]		Yes ☐ No ☐ N/A ☒
2	Has a container or tank that does not comply with paragraph (F)(1) of this rule by being overpacked or taken out of service by the LQHUW by transferring the contents of the container or tank to another container or tank? [3745-273-33 (F)(2)]		Yes ☐ No ☐ N/A ☐
3	Does the LQHUW who stores antifreeze in a container keep the container closed except when adding or removing antifreeze? [3745-273-33 (F)(3)]		Yes ☐ No ☐ N/A ☐
4	Does the LQHUW store antifreeze in a tank that complies with paragraphs (B) to (H) of rule 3745-66-101 of the Administrative Code? [3745-273-33 (F)(4)]		Yes ☐ No ☐ N/A ☐ If tanks are used complete the SQG tank checklist.
5	Does the LQHUW prevent the commingling or contamination of antifreeze, subsequent to the removal of the antifreeze from a heat exchanger or other equipment when used to winterize that equipment, with listed hazardous waste or a characteristic hazardous waste as described in Chapter 3745-51 of the Administrative Code? [3745-273-33 (F)(5)]		Yes ☐ No ☐ N/A ☐
6	Did the LQHUW develop and maintain at the facility a procedure that describes how antifreeze will be prevented from being commingled or contaminated subsequent to removal of the antifreeze from a heat exchanger or other equipment when used to winterize that equipment with a listed hazardous waste or a characteristic hazardous waste as described in Chapter 3745-51 of the Administrative Code? [3745-273-33 (F)(6)]		Yes ☐ No ☐ N/A ☐
7	Does the LQHUW who manages antifreeze use dedicated antifreeze collection and storage containers and tanks for the management of antifreeze? [3745-273-33 (F)(7)]		Yes ☐ No ☐ N/A ☐
8	A LQHUW may reclaim antifreeze provided the handler does the following:		
	a	Does the LQHUW use commercially available equipment, or equipment specifically custom designed or retrofitted according to accepted engineering practices based on established codes, standards, published technical reports or similar peer reviewed documents to reclaim the antifreeze as "reclaimed" is defined in rule 3745-51-01 of the Administrative Code? [3745-273-33 (F)(8)(a)]	Yes ☐ No ☐ N/A ☐
	b	Does the LQHUW use reclamation equipment that has sufficient processing capacity to reclaim the quantity of antifreeze received or generated by the handler within one year? [3745-273-33 (F)(8)(b)]	Yes ☐ No ☐ N/A ☐
	c	Does the LQHUW train each operator of the reclamation equipment regarding the proper operation and maintenance of the antifreeze reclamation equipment? [3745-273-33 (F)(8)(c)]	Yes ☐ No ☐ N/A ☐
RMK			

8	d	Does the LQHUW determine if the wastes generated from the reclamation of antifreeze are "hazardous wastes" as described in Chapter 3745-51 of the Administrative Code. [3745-273-33 (F)(8)(d)] If a waste meets the definition of "hazardous waste," the handler is a hazardous waste generator and is subject to Chapter 3745-52-11	Yes ☐ No ☐ N/A ☐ If applicable complete the appropriate generator checklist.
9	Does the LQHUW upon detection of a release of antifreeze do the following, as applicable:		
	a	Stop the release of antifreeze? [3745-273-33 (F)(9)(a)]	Yes ☐ No ☐ N/A ☐
	b	Contain the released antifreeze? [3745-273-33 (F)(9)(b)]	Yes ☐ No ☐ N/A ☐
	c	Clean up and properly manage and dispose of the released antifreeze and other materials generated from the cleanup according to applicable waste management requirements? [3745-273-33 (F)(9)(c)]	Yes ☐ No ☐ N/A ☐
	d	Remove a leaking container or tank from service by transferring the contents to another container or tank? [3745-273-33 (F)(9)(d)]	Yes ☐ No ☐ N/A ☐
	e	Overpack or replace any leaking storage container? [3745-273-33 (F)(9)(e)]	Yes ☐ No ☐ N/A ☐
	f	Repair any leaking container or tank prior to returning the container or tank to service? [3745-273-33 ((F)(9)(f)]	Yes ☐ No ☐ N/A ☐
10	Spilled universal waste antifreeze that is recovered in liquid form or materials used to absorb a spill of universal waste antifreeze may be managed as universal waste antifreeze? [3745-273-33 (F)(10)]		
11	Does the LQHUW who manages antifreeze train employees who manage antifreeze regarding the universal waste requirements applicable to antifreeze, the proper management of antifreeze, the procedure to prevent contamination of antifreeze with characteristic hazardous waste or listed hazardous waste, and the proper response to a release of antifreeze? [3745-273-33 (F)(11)]		Yes ☐ No ☐ N/A ☐
UNIVERSAL WASTE ANTIFREEZE LABELING			
12	Each container or tank of universal waste antifreeze used to accumulate antifreeze shall be labeled with words that identify the contents of the container or tank (for example, used antifreeze, spent antifreeze, UW antifreeze, recyclable antifreeze)? [3745-273-34 (F)(11)]		Yes ☐ No ☐ N/A ☐
RMK			

G. UNIVERSAL WASTE PAINT AND PAINT-RELATED WASTE		
APPLICABILITY 3745-273-89		
1	Chapter 3745-273 of the Administrative Code applies to persons managing "paint" and "paint-related waste" as defined in rule 3745-273-09 of the Administrative Code, except as provided in paragraph (C)(2) of this rule.	
2	Chapter 3745-273 of the Administrative Code does not apply to persons managing the following paint and paint-related wastes:	
	a	Paint and paint-related wastes that are not yet a waste under Chapter 3745-51 of the Administrative Code. Paragraph (C)(3) of this rule describes when paint and paint-related waste becomes a waste.
	b	Paint and paint-related waste that is not a hazardous waste. Paint and paint-related waste is a hazardous waste if the paint or paint-related waste exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or if the paint or paint-related waste is listed in rules 3745-51-30 to 3745-51-35 of the Administrative Code.
	c	Paint and paint-related waste that subsequent to generation is mixed with another waste that is not paint or a paint-related waste that exhibits one or more of the characteristics identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code or is mixed with another waste that is listed in rules 3745-51-30 to 3745-51-35 of the Administrative Code.
3	**Generation of universal waste paint and paint-related waste**	
	a	Used paint-related waste becomes a waste on the date the used paint-related waste is discarded.
	b	Unused paint becomes a waste on the date the handler decides to discard the unused paint, or on the date the unused paint is no longer useable.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Specific Gravity of Inks = 0.9 to 1.5

0.9 to 1.5 x 8.345 = 7.51 to 12.52 lbs./g

7.51 lbs./g x 55 g/drum = 413 lbs./drum

12.52 lbs./g x 55 g/drum = 688 lbs./drum

5000 kg x 2.2 lbs./kg = 11000 lbs.

11000 lbs. / 413 lbs./drum is approximately
= 26 drums

11000lbs. /688 lbs./drum is approximately
= 15 drums

Density of Latex Paints = 11.54 lbs./g

11.54 lbs./g

11.54 lbs./g x 55 g/drum = 634 lbs./drum

5000 kg x 2.2 lbs./kg = 11000 lbs.

11000 lbs. / 634 lbs./drum is approximately
= 17 drums

G. ☐ UNIVERSAL WASTE PAINT AND PAINT-RELATED WASTE			
	Does the LQHUW manage universal waste paint and paint-related wastes in a way that prevents releases of any universal waste or any component of a universal waste to the environment as follows:		
1	Does the LQHUW store universal waste paint or paint-related wastes in units that feed crushing or shredding equipment (i.e., hopper), containers, or tanks that are structurally sound and compatible with the paint or paint-related wastes. Such hoppers, containers, and tanks shall lack leakage or damage, including severe corrosion, which could cause leakage under reasonably foreseeable conditions? [3745-273-33 (G)(1)]	Yes ☐ No ☐ N/A ☐	
2	Does the LQHUW ensure that a hopper, container, or tank that does not comply with paragraph (G)(1) of this rule is overpacked or taken out of service by transferring the contents to another hopper, container, or tank? [3745-273-33 (G)(2)]	Yes ☐ No ☐ N/A ☐	
3	Does the LQHUW keep hoppers and containers that hold paint and paint-related wastes closed except when adding or removing paint or paint-related wastes? [3745-273-33 (G)(3)]	Yes ☐ No ☐ N/A ☐	
4	Does the LQHUW store paint or paint-related waste in a tank that complies with rules 3745-66-90 to 3745-66-99 except paragraph (C) of rule 3745-66-97 of the Administrative Code? [3745-273-33 (G)(4)]	Yes ☐ No ☐ N/A ☐	If tanks are used complete the LQG tank checklist.
5	Does the LQHUW who generates universal waste paint and paint-related wastes on-site may recycle such paint and paint-related wastes on-site by reclamation, use, or reuse as described in rule 3745-51-02 of the Administrative Code if the wastes are not burned for energy recovery or used in a manner constituting disposal according to rule 3745-51-02 of the Administrative Code? [3745-273-33 (G)(5)]	Yes ☐ No ☐ N/A ☐	
6	Does the LQHUW who receives universal waste paint from another universal waste handler may recycle such paint by reclamation, use, or reuse as described in rule 3745-51-02 of the Administrative Code if the universal waste paint is not burned for energy recovery or used in a manner constituting disposal according to rule 3745-51-02 of the Administrative Code? [3745-273-33 (G)(6)]	Yes ☐ No ☐ N/A ☐	
7	Waste from the reclamation of universal waste paint and paint-related wastes are not universal wastes for the purposes of this rule? [3745-273-33 (G)(7)]		
	a Did the LQHUW evaluate the wastes to determine if such wastes are listed hazardous wastes or characteristic hazardous waste as described in Chapter 3745-51 of the Administrative Code?	Yes ☐ No ☐ N/A ☐	
	b If a waste meets the definition of "hazardous waste," the handler is a hazardous waste generator and is subject to Chapter 3745-52.	Yes ☐ No ☐ N/A ☐	If applicable complete the appropriate generator checklist.
RMK			

8	Does the LQHUW who recycles universal waste paint and paint-related wastes as described in paragraphs (G)(5) and (G)(6) of this rule ensure that employees responsible for recycling universal waste paint and paint-related wastes are trained regarding the proper operation and maintenance of the recycling process? [3745-273-33 (G)(8)]			Yes ☐ No ☐ N/A ☐
9	Does the LQHUW upon detection of a release of paint or paint-related wastes do the following, as applicable:			
	a	Stop the release? [3745-273-33 (G)(9)(a)]		Yes ☐ No ☐ N/A ☐
	b	Contain the released paint or paint-related wastes? [3745-273-33 (G)(9)(b)]		Yes ☐ No ☐ N/A ☐
	c	Clean up and properly manage the released paint or paint-related wastes and other materials generated from the clean-up? [3745-273-33 (G)(9)(c)]		Yes ☐ No ☐ N/A ☐
	d	Remove a leaking container or tank from service by transferring the contents to another container or tank? [3745-273-33 (G)(9)(d)]		Yes ☐ No ☐ N/A ☐
	e	Overpack or replace any leaking storage container? [3745-273-33 ((G)(9)(e)]		Yes ☐ No ☐ N/A ☐
	f	Repair any leaking container or tank prior to returning the container or tank to service? [3745-273-33 (G)(9)(f)]		Yes ☐ No ☐ N/A ☐
10	Does the LQHUW manage paint and paint-related wastes that are ignitable or reactive in accordance with the following:			
	a	1	Does the LQUHW store containers holding paint and paint-related wastes at least 50 feet from the property line [3745-273-33 (G)(10)(a)] or	Yes ☐ No ☐ N/A ☐
		2	Has obtained written approval from the authority having jurisdiction over the local fire code allowing alternative storage less than fifty feet from the facility's property line? [3745-273-33 (G)(10)(a)]	Yes ☐ No ☐ N/A ☐
		3	Does the LQUHW maintain a written approval on-site for as long as the ignitable or reactive paint and paint-related wastes are managed on-site?	Yes ☐ No ☐ N/A ☐
	b	In compliance with rule 3745-65-17 of the Administrative Code? [3745-273-33 (G)(10)(b)]		Yes ☐ No ☐ N/A ☐ If applicable use the checklist for ignitable, reactive and incompatible wastes.
11	Does the LQHUW manage paint and paint-related wastes that are incompatible in accordance with rule 3745-66-77 of the Administrative Code? [3745-273-33 (G)(11)]			Yes ☐ No ☐ N/A ☐ If applicable use the checklist for incompatible wastes.
12	Does the LQHUW design, construct, maintain, and operate the facility to minimize the possibility of a fire, explosion, or unplanned sudden or non-sudden release of universal waste or hazardous constituents to air, soil, or surface water which could threaten human health or the environment? [3745-273-33 (G)(12)]			Yes ☐ No ☐ N/A ☐
13	*A LQHUW may open containers of universal waste paint and scrape, pour, pump or drain the universal waste paint from the container to collect the paint and render the container empty?*			
RMK				

14	The LQHUW may puncture, shred, or crush containers of paint that do not exceed five gallons in volume to remove and collect the contents of the container rendering the container empty provided the handler does all of the following:		
	a	Does the LQHUW use commercially available equipment or equipment specifically custom designed or retrofitted according to accepted engineering practices based on established codes, standards, published technical reports, or similar peer reviewed documents to puncture, shred, or crush and empty the paint containers within an enclosed compartment or hopper? [3745-273-33 (G)(14)(a)]	Yes ☐ No ☐ N/A ☐
	b	Does the LQHUW use equipment that has sufficient processing capacity to empty the quantity of paint containers received or generated within one year? [3745-273-33 (G)(14)(b)]	Yes ☐ No ☐ N/A ☐
	c	Does the LQHUW collect the liquids from the paint container? Collected liquids are still classified as universal waste paint. [3745-273-33 (G)(14)(c)]	Yes ☐ No ☐ N/A ☐
	d	Does the LQHUW maintain the puncturing, crushing and shredding equipment and replace air filters according to the manufacturer's specifications? [3745-273-33 (G)(14)(d)]	Yes ☐ No ☐ N/A ☐
	e	Does the LQHUW train each operator of the equipment used to shred, puncture, or crush containers of universal waste paint regarding the maintenance and proper operation of the equipment? [3745-273-33 (G)(14)(e)]	Yes ☐ No ☐ N/A ☐
PAINT AND PAINT-RELATED WASTES LABELING			
15	Has the LQHUW labeled each container, tank, multiple container or hopper in which universal waste paints is accumulated with words that identify the contents of the container, tank, multiple containers or hopper (for example, UW paint, paint waste or recyclable paint)? [3745-273-34 (H)(1)]		Yes ☐ No ☐ N/A ☐
16	Has the LQHUW labeled each container or tank in which universal paint-related wastes is accumulated to identify the contents of the container or tank (for example, paint-related UW, paint-related waste, paint wastes, paint rags, used paint stripper or used paint blast media)? [3745-273-34 (H)(2)]		Yes ☐ No ☐ N/A ☐
RMK			

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

***NOTE:** 1. Inspectors can check BUSTR's web-site at: http://www.com.ohio.gov/fire/ to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://apps.com.ohio.gov/fire/OTTER.*

***NOTE: 2.** Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum. In addition a used oil generator who is burning used oil in any device other than a space heater must comply with the burner requirements in OAC rules 3745-279-60 through 3745-279-67).*

PROHIBITIONS			
1.		Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes ☐ No ☒ N/A ☐
2.		Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☑
NOTE: For example, used oil contaminated scrap metal stored in a pile where you have flowing oil. Or oil leaking out of a dumpster.			
3.		Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes ☐ No ☒ N/A ☐
4.		Does the generator burn off-specification used oil that only they generated? If Yes skip to 5. If No answer 4 a & b.:	Yes ☐ No ☒ N/A ☐
NOTE: All used oil is considered "off-specification" until the requirements of OAC rule 3745-279-72 have been satisfied.			
	a.	Is the used oil burned for energy recovery? [3745-279-12(C)] (to provide heat) If yes:	Yes ☐ No ☒ N/A ☐
	b.	Does the generator only burn the off-specification used oil in one of the following units: Industrial furnaces, Boilers – including industrial boilers, utility boilers, a used oil-fired space heater, or a hazardous waste incinerator?	Yes ☐ No ☐ N/A ☒
ON-SITE BURNING IN SPACE HEATER			
5.		Does the generator burn used oil in used-oil fired space heater? [3745-279-23] If so:	
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☒ N/A ☐
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☐
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☐
RMK			

GENERATOR STANDARDS				
6.	Does the used oil generator's used oil contain greater than 1,000 ppm total halogens? [3745-279-21(B)] If so:			Yes ☐ No ☒ N/A ☐
	a.	Did the used oil generator successfully rebut the presumption that this used oil is not a hazardous waste? [3745-279-21(B)] If not:		Yes ☒ No ☐ N/A ☐
	b.	Does the used oil generator manage this used oil as a hazardous waste? [3745-279-21(B)]		Yes ☐ No ☒ N/A ☐
NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted. However, the rebuttable presumption does not apply to metalworking oils/fluids as described in paragraph (B)(1)(b)(i) of rule 3745-279-10 of the Administrative Code and used oils removed from refrigeration units as described in paragraph (B)(1)(b)(ii) of rule 3745-279-10 of the Administrative Code. It does not apply to a CESQG described in paragraph (C) of rule 3745-279-10 of the Administrative Code.				
7.	Did the generator mix their hazardous waste with their used oil? If so,			Yes ☐ No ☒ N/A ☐
	a.	Is the generator that mixed their hazardous waste with their used oil a CESQG during a month that the mixing took place3745-279-10(B)(3)? If yes, skip questions # 9.		Yes ☐ No ☐ N/A ☐
	b.	Is the mixture managed as used oil as specified in 3745-279-10(B)? [3745-279-21(A)]		Yes ☐ No ☐ N/A ☐
NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.				
	c.	Did the generator mix a listed hazardous waste (listed in rules 3745-51-30 to 3745-51-35) with their used oil? If so:		Yes ☐ No ☒ N/A ☐
		i.	Is the mixture managed as a hazardous waste? [OAC 3745-279-10(B)(1)(a)] or	Yes ☐ No ☐ N/A ☐
	d	Did the generator mix a hazardous waste listed solely because it exhibits a characteristic identified in rules 3745-51-20 to 3745-51-24 and used oil and mixtures of hazardous waste that is listed in rules 3745-51-30 to 3745-51-35 of the Administrative Code solely because it exhibits one or more of the characteristics of hazardous waste identified in rules 3745-51-20 to 3745-51-24? If yes,		Yes ☐ No ☐ N/A ☐
		i.	Does the resultant mixture exhibit the characteristic of a hazardous waste specified in 3745-279-10(B)(2)(a)? [3745-279-21(A)]? If yes:	Yes ☐ No ☐ N/A ☐
		ii.	Is the mixture managed as a hazardous waste? [OAC 3745-279-10(B)(2)(a)]	Yes ☐ No ☐ N/A ☐
	e	Did the generator mix an ignitable characteristic hazardous waste (e.g., ignitable-only mineral spirits) with their used oil? If so: If yes,		Yes ☐ No ☐ N/A ☐
		i.	Does the resultant waste exhibit the characteristic of ignitability? If yes	Yes ☐ No ☐ N/A ☐
		ii.	Is the mixture managed as a hazards waste 279-10(B)(2)(c)	Yes ☐ No ☐ N/A ☐
8.	Does the generator store used oil in unit(s) (impoundments) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]			Yes ☐ No ☐ N/A ☐

9.	Does the generator store used oil in tank or containers? [3745-279-22(A)]		Yes ☒ No ☐ N/A ☐
10.	Condition of units. Containers and aboveground tanks used to store used oil at the generator facilities must be: [3745-279-22(B)(1) or(2)]		
	a.	In good condition (no severe rusting, apparent structural defects or deterioration); and [3745-279-22(B)(1)]	Yes ☒ No ☐ N/A ☐
	b.	Not leaking (no visible leaks). [3745-279-22(B)(2)]	Yes ☒ No ☐ N/A ☐
11	Are containers and aboveground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)(1)]		Yes ☒ No ☐ N/A ☐
12.	Are fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)(2)]		Yes ☒ No ☐ N/A ☐
13.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		
	a.	Stopped the release?	Yes ☒ No ☐ N/A ☐
	b.	Contained the release?	Yes ☒ No ☐ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☒ No ☐ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☒ No ☐ N/A ☐
GENERATOR TRANSPORTATION			
14.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☒ No ☐ N/A ☐
15.	The generator may self-transports used oil to an approved collection center (A) or to an aggregation point (B) owned by the generator provided that: [3745-279-24 (A)(or (B)]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24 (A) or (B)]	Yes ☒ No ☐ N/A ☐
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24 (A) or (B)]	Yes ☒ No ☐ N/A ☐
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
15.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes ☐ No ☐ N/A ☐
16.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31(B)(2)]		Yes ☐ No ☐ N/A ☐
17.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32 (B)(2)]		Yes ☐ No ☐ N/A ☐
RMK			

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS			
GENERAL REQUIREMENTS WHEN NOT MAKING AN LDR DETERMINATION			
1	If the generator chooses not to make the determination of whether his waste must be treated, with the initial shipment of waste to each treatment or storage facility, the generator must send a one-time written notice to each treatment or storage facility receiving the waste. [3745-270-07(A)(2)] This notice must include the information in column A of table 1 of this rule, with the following information:		
	a.	Are the EPA hazardous waste numbers and manifest number of the first shipment	Yes ☒ No ☐ N/A ☐
	b	Does it state "This hazardous waste may or may not be subject to the LDR treatment standards? The treatment facility must make that determination."	Yes ☒ No ☐ N/A ☐
Note No further notification is necessary until such time as the waste changes or the treatment or storage facility changes. If this occurred, has a new notification been sent to the new treatment or storage facility; and			
	C	Has a copy of the new notice been placed in the generator's files?	Yes ☒ No ☐ N/A ☐
2.	Is the form/notice kept on-site for three years after last HW shipped? [3745-270-07(A)(8)]		Yes ☒ No ☐ N/A ☐
RMK			

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS		
EXCLUDED WASTE		
GENERAL REQUIREMENTS		
1.	If a generator determines that he is managing a prohibited waste that is excluded from the definition of "hazardous waste" or "waste," or is exempt from regulation as a hazardous waste under rules 3745-51-02 to 3745-51-06 of the Administrative Code subsequent to the point of generation [including deactivated characteristic hazardous wastes managed in wastewater treatment systems subject to the Clean Water Act (CWA) as specified in paragraph (A)(2) of rule 3745-51-04 of the Administrative Code, or are CWA-equivalent, or are managed in an underground injection well regulated by the Safe Drinking Water Act], Did the generator place in the generator's files a one-time notice describing such generation, subsequent exclusion from the definition of "hazardous waste" or "waste" or exemption from regulation as a hazardous waste, and the disposition of the waste. [3745-270-07(A)(7)]	Yes ☒ No ☐ N/A ☐
2.	Generators must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. [3745-270-07(A)(8)]	Yes ☒ No ☐ N/A ☐
RMK		

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS			
WASTE MEETING LDRs at the POINT of GENERATION			
GENERAL REQUIREMENTS			
1.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,		Yes ☒ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).			
2.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standards based on generator knowledge in conjunction with #1, above? [3745-270-07(A)(6)(a)		Yes ☒ No ☐ N/A ☐
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standards based on testing in conjunction with #1, above? 3745-270-07(A)(6)(b)]		Yes ☒ No ☐ N/A ☐
4.	The generators must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to this rule for at least three years from the date that the waste that is the subject of such documentation was last sent to on-site or off-site treatment, storage, or disposal. [3745-270-07(A)(8)]		Yes ☒ No ☐ N/A ☐
5.	Does the waste or contaminated soil meet the treatment standard at the original point of generation?		Yes ☒ No ☐ N/A ☐
	If so, with the initial shipment of waste to each treatment, storage, or disposal facility, the generator must send a one-time written notice to each treatment, storage, or disposal facility receiving the waste. [3745-270-07(A)(3)(a)] This notice must include all of the following information:		
	a	The EPA hazardous waste numbers and manifest number of first shipment	Yes ☒ No ☐ N/A ☐
	b	The notice must include the information in column B of table 1 of this rule	Yes ☒ No ☐ N/A ☐
	c	The notice must include the statement: "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rules 3745-270-40 to 3745-270-49 of the Administrative Code. I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes ☒ No ☐ N/A ☐
6.	If the waste changes, the generator must send a new notice and certification to the receiving facility, and place a copy in their files. [3745-270-07(A)(3)(c)]		Yes ☒ No ☐ N/A ☐
RMK			

GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS			
WASTE NOT MEETING LDRs at the POINT of GENERATION			
GENERAL REQUIREMENTS			
1.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,		Yes ☑ No ☐ N/A ☐
NOTE: This is done by determining if the HW /soil contain levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).			
2.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standards based on generator knowledge in conjunction with #1, above? [3745-270-07(A)(6)(a)		Yes ☑ No ☐ N/A ☐
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standards based on testing in conjunction with #1, above? 3745-270-07(A)(6)(b)]		Yes ☑ No ☐ N/A ☐
4.	Does the generator keep the documentation required in #1, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]		Yes ☑ No ☐ N/A ☐
WASTES THAT EXHIBIT A CHARACTERISTIC			
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes:		Yes ☒ No ☐ N/A ☐
	a.	Did the generator determine if the listed HW exhibits a characteristic that contains underlying hazardous constituents that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes ☑ No ☐ N/A ☐
	b.	Did the generator determine if the characteristic is treated under the same treatment standard for the listed HW? [3745-270-09(B)]	Yes ☑ No ☐ N/A ☐
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.			
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.			
NOTE: Written documentation of this determination is not required.			
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
PROHIBITED DILUTION			
6.	Is the HW treated by burning?		Yes ☐ No ☐ N/A ☑
7.	Is the HW a metal-bearing HW?		Yes ☑ No ☐ N/A ☐
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.			
RMK			

8.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless **one** of the following conditions apply. [3745-270-03(c)]		
		i.	Contains hazardous organic constituents or cyanide at levels exceeding the constituent-specific treatment standard in rule 3745-270-48?	Yes ☒ No ☐ N/A ☐
		ii.	Is made up of combustible material e.g., paper, wood, plastic contaminated with an inorganic metal-bearing hazardous waste?	Yes ☒ No ☐ N/A ☐
		iii.	Has a reasonable heating value (e.g., > 5000 Btu/pound)?	Yes ☒ No ☐ N/A ☐
		iv.	The waste is co-generated with wastes for which combustion is a required method of treatment?	Yes ☒ No ☐ N/A ☐
		v.	The waste contains greater than one per cent total organic carbon.	Yes ☒ No ☐ N/A ☐
	b.	If all responses to 9 a. (i. to v.) are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution or burning?		Yes ☒ No ☐ N/A ☐
9.	Was the HW treated by wastewater treatment? Treating wastes in a CWA-equivalent treatment system, or which treat wastes for purposes of pretreatment requirements under Section 307 of the CWA is not impermissible dilution for purposes of this rule unless:			Yes ☐ No ☐ N/A ☒
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]		Yes ☐ No ☐ N/A ☐
	b.	Is the waste is a D003 reactive cyanide wastewater or Non-wastewater?		Yes ☐ No ☐ N/A ☐
	c.	Does the waste carry the D001 code and contain ≥10% TOC?		Yes ☐ No ☐ N/A ☐
	d.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?		Yes ☐ No ☐ N/A ☐
NOTE: If the answers to a, b & c are "yes" and d is "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				
GENERATOR TREATMENT NOT MEETING LDR STANDARDS				
10.	Did the generator treat their HW /soil on-site?			Yes ☐ No ☒ N/A ☐
10a	Was the treatment NOT intended to meet the LDR treatment standard? If No skip to question 14			Yes ☐ No ☐ N/A ☐
11.	Is the generator managing and treating prohibited waste or contaminated soil in tanks, containers, or containment buildings regulated under rule 3745-52-34 of the Administrative Code 3745-270-07 (A)(5)			Yes ☐ No ☐ N/A ☐
NOTE: When treating hazardous waste to make it less hazardous or non-hazardous but NOT treating to meet LDRs the generator is NOT required to have a WAP and may not need to use a hazardous waste manifest if treated to be non-hazardous. However, they must notify the disposal facility that the waste must still be treated to meet the LDR treatment standards for the waste as it was generated.				
12.	Is the form/notice kept on-site for three years after last HW shipped? [3745-270-07(A)(8)]			Yes ☒ No ☐ N/A ☐
RMK				

GENERATOR TREATMENT TO MEET LDRS			
13.	Does the generator treat to meet LDRs on-site?		Yes ☐ No ☒ N/A ☐
	If "Yes" … complete the rest of the checklist. If "No" …Skip to question 17.		
14.	Did the generator treat their hazardous waste/soil in the following:		Yes ☐ No ☐ N/A ☐
	a.	A tank, container, drip pad or containment building? 3745-270-07(A)(5)	Yes ☐ No ☐ N/A ☐
	b.	Did the generator develop and follow a written waste analysis plan (WAP) that describes the procedures they will carry out to comply with the treatment standards? [3745-270-07(A)(5)]	Yes ☐ No ☐ N/A ☐
Note: Generators treating hazardous debris under the alternate treatment standards of the table in rule 3745-270-45 of the Administrative Code, however, are not subject to this waste analysis requirement.			
15	Does the WAP include all the following?		
	a.	A detailed chemical and physical analysis of the HW/soil to develop the WAP? [3745-270-07(A)(5)(a)]	Yes ☐ No ☒ N/A ☐
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.			
	b.	All information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☐
	c.	The testing frequency? [3745-270-07(A)(5)(a)]	Yes ☐ No ☐ N/A ☐
16	Does such a plan include all the following elements? [3745-270-07(A)(5)(b)]		
	a.	It must be kept in the generator's on-site files? [3745-270-07(A)(5)(b)]	Yes ☐ No ☐ N/A ☐
	b.	It must be made available to inspectors? [3745-270-07(A)(5)(b)]	Yes ☐ No ☐ N/A ☐
NOTIFICATION FORM			
17.	Does the LDR Notification form contain the following information:		
	a.	Manifest number of the first waste shipment to the treatment or storage facility? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.			
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories			
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.			

	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes ☒ No ☐ N/A ☐
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.			
RMK			

TREATMENT OF HAZARDOUS WASTE SOILS					
18.	a.	If the waste or contaminated soil meets the treatment standard at the original point of generation, Did the generator send a one-time written notice with the initial shipment that contains the following certification statement? "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. . I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment." [3745-270-07(A)(3)(a)]			Yes ☒ No ☐ N/A ☐
	b.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:			
		i.	Prepare a one-time notification and certification? [3745-270-09 (D)]		Yes ☒ No ☐ N/A ☐
		ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]		Yes ☒ No ☐ N/A ☐
		iii.	Include in the notification: [3745-270-09(D)]		
			1.	Name & address of receiving landfill?	Yes ☒ No ☐ N/A ☐
			2.	Description of HW when generated?	Yes ☒ No ☐ N/A ☐
			3.	HW code when generated?	Yes ☒ No ☐ N/A ☐
			4.	Treatability group when generated?	Yes ☒ No ☐ N/A ☐
			5.	Underlying hazardous constituents present when generated?	Yes ☒ No ☐ N/A ☐
		iv.	Contain the certification statement as required by 3745-270-07(B)(4)?		Yes ☒ No ☐ N/A ☐
RMK					

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265. 1080	**Do any of the following exclusions apply? If yes, please circle.**	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	**Do any of the following exemptions apply? If yes, please circle**	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	**Waste Determination**:	Determination Not Needed (b)	**Determination Needed**

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF

CONTAINER MANAGEMENT 265.1087

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process

CC-4	265.1087	**Controls**	NA	NI	OK	DF

One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1		Level 2	Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CC -5	265.1087	Waste transfer requirements				
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087	Operating requirements	NA	NI	OK	DF
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)			-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements	NA	NI	OK	DF
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)			Inspection requirements are the same as for tanks			
CC- 8	265.1087	Repair requirements	NA	NI	OK	DF
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)			Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	Recordkeeping requirements	NA	NI	OK	DF
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			